

London Borough of Hammersmith and Fulham

SUBMISSION LOCAL PLAN REGULATION 22 (1) (c) STATEMENT

FEBRUARY 2017

Hammersmith and Fulham Council

HAMMERSMITH & FULHAM'S SUBMISSION LOCAL PLAN REGULATION 22 (1) (c) STATEMENT

Purpose

This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation / representations. It is produced to respond to and therefore fulfil requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and specifically Regulation 22(1) part (c).

This requires the submission to the Secretary of State of a statement setting out:

- which bodies and persons the local planning authority invited to make representations under Regulation 18;
- how those bodies and persons were invited to make representations under Regulation 18;
- a summary of the main issues raised by the representations made pursuant to Regulation 18;
- how any representations made pursuant to Regulation 18 have been taken into account;
- if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- if no representations were made in Regulation 20, that no such representations were made.

The statement should be read alongside the council's Proposed Submission Local Plan Consultation Statement September 2016 (see Appendix 1) which sets out, amongst other things, which bodies and persons were invited to make representations under Regulation 18 and 19 and provides a summary and actions in response to representations to the Draft Local Plan 2015 (Regulation 18).

Background

The council's Proposed Submission Local Plan and supporting documents, including the sustainability appraisal and consultation statement, were published in accordance with Regulation 19 for a six week consultation period lasting from Friday 16th September until Friday 28 October 2016. The council consulted specific consultation bodies and other statutory bodies, local amenity and residents groups, businesses and individual residents. A variety of consultation techniques were used.

Representations made pursuant to Regulation 20

Responses were received from 77 consultees. The council has broken down the responses into 642 separate points or representations.

Summary of the main issues raised

Set out below is the council's summary of the main issues raised in the representations together with a comment on whether any minor changes have been made by the council in response. This summary should be read in conjunction with the council's minor changes schedule which is available on the council website:

www.lbhf.gov.uk/localplan

Issues of conformity with the London Plan

The Greater London Authority/Mayor of London is of the opinion that the proposed submission Local Plan "is in general conformity with the London Plan". The Port of London Authority have questioned the conformity of the Local Plan with the London Plan in relation to Safeguarded Wharves. Several respondents questioned the conformity of the Local Plan with the London Plan in relation to housing numbers and the optimisation of development sites.

Council Comment

The council welcomes the Mayor's opinion. The other conformity issues are considered under the relevant topic headings below.

General issues

There was general support for the Proposed Submission Local Plan from respondents. General representations consisted of detail about the background and remit of the companies and organisations that commented and a summary of their more specific representations. There were key issues raised regarding the robustness of the evidence base for sport and leisure, the overall provision of accessibility and inclusivity, the duty to co-operate in relation to housing need, the role of the Old Oak and Park Royal Development Corporation, neighbourhood planning, mineral extraction, the Strategic Flood Risk Assessment and safeguarded wharves.

Council Comment

The council welcomes the support given by a number of respondents. The comments made by Sport England regarding the evidence base for sport and leisure are noted. The council will submit an updated background paper on leisure need to address the issues raised. Further text has been included on neighbourhood planning to address the points raised. The Environment Agency comments on the Strategic Flood Risk Assessment (Draft) and the Surface Water Management Plan are noted and suggested

changes will be incorporated into these documents. With regard to a request for a policy on mineral extraction, comments are noted and notwithstanding paragraph 143 of the NPPF, mineral extraction has not been identified as a local issue for which a policy is required. The general representations that summarise more specific comments against the Local Plan have been considered under the relevant topic areas below.

Introduction and Hammersmith and Fulham (Sections 1 and 2)

This section provides an overview of the issues and challenges faced in Hammersmith and Fulham. Respondents to this section mainly requested clarification or text updates to provide a more thorough or accurate account of the borough and the issues faced. These requests covered a number of topic areas including housing, child play space, sustainable transport, Charing Cross hospital and how the Old Oak and Park Royal Development Corporation should be depicted on the maps within this section.

Council Comment

Changes have been proposed to take account of these points, including amendments to the maps and new wording to clarify the situation with regard to Charing Cross hospital.

Spatial Vision and Objectives (Section 3)

This section sets out the vision and objectives for the borough. A number of respondents including the Disability Forum, Air Quality Commission, Tri-borough Health, Historic England and the Hammersmith Community Gardens Association have requested minor amendments to the vision text and to the Strategic objectives. The Royal Borough of Kensington and Chelsea requested that the reference to a potential Crossrail station at Imperial Wharf Station be removed.

Council Comment

Changes to the vision and strategic objectives have been proposed to take account of these points, including new wording to emphasise the council's objectives with regard to accessibility and air quality. The council consider that the wording for a potential Crossrail Station at Imperial Wharf Station is an acceptable statement of the council's ambitions and will be retained in the Plan.

Delivery and Implementation (Section 4)

This section indicates how the council intends to deliver and implement the policies and proposals within the Local plan. One main area of concern was raised in representations. This was the viability of the plan, in particular the viability protocol in appendix 9, the affordable housing policy with a target of 50% and other competing demands that affect the viability of development such as the CIL charge.

Council Comment

The Council's Housing Viability Assessment has tested all policy requirements, including the current CIL rates. Many scenarios were tested across the borough, based on the 50% affordable housing target with a split of 60% rented housing and 40% shared ownership, which found that development in general is viable. The Council recognises that each planning application will be assessed on its own merits and that viability will vary depending on the specifications of any site. The policy position, therefore is considered to be flexibly prepared and consistent with the NPPF. The Viability Protocol establishes the Council's approach and expectations from developers when submitting viability assessments. The Viability Protocol is referenced in Policies DEL1 (and HO3) as a factor to be included when negotiating planning obligations. In accordance with the PPGs (para. 24) viability assessments will be necessary when obligations are under consideration.

Regeneration Strategies (Section 5)

This section of the document includes specific policies for our regeneration areas and site policies within those areas. There was objection to the indicative new homes target anticipated in the Regeneration Areas which respondents felt should be a minimum target. There was specific objection to policies FRA and FRA1. As currently worded they are considered to create uncertainty that the West Kensington and Gibbs Green Housing estates are only to be 'improved'. Respondents felt that this is not considered to be in conformity with the London Plan and assumed housing output as stated in the Local Plan. Several respondents felt that the policy wording for the regeneration areas and site proposals should more clearly acknowledge the potential for high density development in the areas designated in the London Plan as Opportunity Areas. Some minor and technical changes were requested by Imperial College London, Historic England, Royal Borough of Kensington and Chelsea and the Port of London Authority on a variety of issues including site uses, heritage assets and safeguarded wharves.

Council comment

Regarding the objections relating to the indicative housing targets, this issue was considered by the Core Strategy Inspector and he concluded that only where there was a measure of certainty on housing numbers a minimum target could be applied to the sites. The council consider that indicative housing targets do not preclude the delivery of a greater number of dwellings. This is reinforced by Policy HO1 of the Local Plan which states among other things that the council will work to exceed the London Plan target of 1,031 additional dwellings per year. For further clarity the council are proposing to amend the wording in policy HO1 to emphasise that the 1,031 homes per year housing target is a minimum target.

The issue raised about the housing estates and the assumed housing output is noted. A number of text changes are proposed to provide clarity about what is meant by 'estate renewal' in order to address the concerns raised.

With regard to the comments relating to optimising housing output in opportunity areas, the council consider that the Regeneration Strategies together with other policies in the Local Plan sufficiently meet the London Plan aim to optimise development opportunities in the designated Opportunity areas. Regarding the minor and technical changes requested, the council has proposed changes to help address the issues raised.

Borough-wide Policies (Section 6)

Meeting Housing Needs and Aspirations

Policies H01 to H011 are concerned with detailed aspects relating to the provision of housing. There was some support for policies concerned with housing supply, but some consultees questioned the soundness of the borough-wide affordable housing target set at 50% and queried the council's policies on housing density and optimisation of housing output. The house builders federation also questioned the soundness of the Council's objectively assessed housing need. Further recognition in the Local Plan was requested on 'Build for Rent' and 'Self Build' housing. The need for further flexibility in policies regarding the mix, occupation and distribution of housing was also raised in a number of instances.

Council comment

A number of changes have been suggested by the council to address the concerns raised on the housing policies, including new text on 'Build for Rent' and 'Self Build' and text to clarify the situation with regard to optimising housing output, occupation of homes by Londoners and the distribution of affordable homes through a development.

The council's position in relation to affordable housing is considered to be sound and is supported by an up-to-date viability study. The policy allows schemes to be subject to viability and assessed on a case by case basis in line with the NPPF. This also reflects the Mayor's direction of travel in terms of an affordable housing target, which the council supports. A minor amendment will be made to Policy H03 to address the GLA's concerns regarding the target period up to 2025, bringing it in line with London Plan Policy 3.11 (B).

Local Economy and Employment

Policies E1 to E4 seek to support and promote economic development and boost employment in the borough over the plan period. There was general support for the suite of policies in this section. The main concerns raised were with regard to the

robustness of the policies to protect employment floorspace in the borough, the requirement for affordable workspace and the need for specific reference to Class B8 uses and sui generis employment uses. Some clarification on the operation of the criteria for the release of employment sites and the implementation of policy E4 on local employment initiatives was also sought.

Council comment

Changes have been proposed to take account of these points, including an additional statement in the supporting text of proposed policy E1 to add clarity and further detail on affordable workspace and some further text to explain the operation of the criteria in Policies E1 and E2, specifically in relation to alternative uses. Minor changes have been proposed on the other issues to address the comments made, including an acknowledgement in the training and skills Policy (E4) that the policy will assist in addressing social inequalities across the borough.

Town and local centres

There was some support for the Town and Local Centre policies, but also a number of specific objections. In particular respondents raised issues regarding the Retail Need figures in Table 3, the robustness of the Retail Needs Study 2016, the retail quotas in policies TLC2 and TLC3, the restrictions on bookmakers in the primary frontage of town centres, the criteria for marketing as evidence for change of use, the restrictions on takeaways and bookmakers in Policy TLC6 and opening hours in Policy TLC5. Minor amendments were requested to Policy TLC8 on Public houses regarding marketing and a request for exceptions to made in regeneration areas.

Council comment

The council consider the retail needs study 2016 is robust and has adequately estimated retail need in the borough during the plan period. It is not considered necessary to reference the previous retail need study projections in the new Local Plan (Table 3). The difference between the retail need figures identified previously and these new figures is not equivalent to unmet need.

The council's retail policies have been amended since the draft Local Plan in 2015 to provide greater flexibility of permitted uses within the prime and non prime frontages of the town centres and local centres. The revisions made to the policies are supported by our background evidence document – "Retail Quota Policies". The approach to restrict certain uses in the prime retail frontage and the requirement for marketing evidence is long established and was found sound by an Inspector at the examination of the Development management Local Plan.

The correlation between health and the proliferation of takeaways is widely documented and it is considered appropriate in Policy TLC6 to take into account areas where children congregate. This approach was found sound by an Inspector at the

examination of the Development Management Local Plan. With regard to policy TLC6 and the restrictions for bookmakers, applying a criteria which is responsive to the extent of the concentration of bookmakers in the borough is considered to be a flexible and sound approach. 400 metres is considered to be a standard benchmark for walking distance and is considered to be an appropriate way for the council to address the issues of clustering. The associated background paper supports the approach taken.

Some suggested amendments to Policy TLC8 have been incorporated to address the issues raised. However, it is not considered appropriate to allow change of use of pubs in regeneration areas as an exception.

Community facilities, leisure and recreation

Policies CF1 to CF4 are concerned with detailed aspects relating to the protection and provision of community, leisure and recreational facilities and uses. Respondents generally supported the policies, but a number of specific issues were raised in representations to this section, including the need for more evidence on leisure need, the robustness of the policies to protect community and leisure facilities, flexibility in terms of off-site provision, the need to update references to NHS Health boards and strategies, ongoing maintenance of facilities, the definition of community uses, accessible and inclusive design and the need to consider exceptions.

Council comment

The council welcomes the support given by a number of respondents. The comments made by Sport England regarding the evidence base for sport and leisure are noted. The council will submit an updated background paper on leisure need to address the issues raised. This together with other background papers, including the Parks and Open Spaces Strategy and the Open Space background paper and audit are considered to collectively provide a robust evidence base for sport and leisure in the borough.

Policies CF1 and CF2 provide detail on the protection and enhancement of existing facilities and the provision of new and expanded facilities and where off-site provision may be appropriate. It is considered, that Policies CF1 and CF2 together with Policies OS1 and OS2 relating to open space adequately meet the requirements of National Policy and Sport England policy requirements of “protecting, enhancing and making provision” community facilities, both within and outside of the regeneration areas.

Minor text changes are proposed to update referencing and to acknowledge the importance of community facilities for social inclusion and community cohesion.

Green and Public Open space

There was general support for the open space policies. The main concerns raised related to the robustness of policies to protect open space, in particular the flexibility

afforded to development of open space in certain circumstances. Conversely there was also a request to allow more flexibility to develop on open spaces. The Woodland Trust requested that further text be added in relation to access to wildlife sites. Other concerns focused on the provision of open space for food growing, the air quality benefits of open space, maintenance arrangements, green corridors, the importance of trees, and mapping amendments. Local interest groups suggested the policies be strengthened to ensure that children's playspace needs were adequately addressed.

Council comment

Minor changes have been proposed to clarify policy, including further emphasis on the protection and enhancement of open spaces and additions to the supporting text regarding access to wildlife sites, children's playspace and food growing. Map 6 of the plan will be amended as requested.

River Thames

Policies RTC1 to RTC4 are concerned with the protection and promotion of the River Thames. Two main issues were raised in the representations on this topic. The first concerned the need for improvement and protection of flood defences. The second issue concerned the designated safeguarded wharves within the borough and the role of the river for movement of passengers and freight and for leisure pursuits, with the Port of London Authority requesting changes to the policy. Other issues were raised regarding the Grand Union canal, Thames Strategy Kew to Chelsea, public safety, cycling on the towpath, moorings, the historic environment and accessible and inclusive design.

Council comment

Minor changes have been proposed, including amendment to Policy RTC1 to promote passenger and freight movement by river. Other changes to policies and the supporting text have been proposed to reference leisure, moorings, the historic environment, the Thames Estuary 2100 Plan and the Thames River Basin Management Plan. It is considered that policies adequately deal with public safety and protection and improvement of flood defences. The Grand Union canal is now under the planning control of the Old Oak and Park Royal Development Corporation and therefore policy provision for the canal is not considered to be appropriate in the Local Plan. The Thames Strategy Kew to Chelsea is referenced in the supporting text of the River policies and further reference is not considered necessary.

Design and Conservation

This set of policies received a number of comments during the proposed submission consultation, with developers and amenity groups offering both support and opposition. Developers suggested that there should be greater flexibility with regard to the location of tall buildings, but this view was not supported by amenity groups. There

was also a call for the policies, particularly policies DC3, DC7 and DC8 to be amended to better reflect the NPPF in relation to 'substantial' harm and the public benefits of tall buildings. There was also a request for views analysis to be published and for it to specify where tall buildings have been successful and to provide views analysis for heritage assets. There were also requests for references to heritage led regeneration, good neighbourliness, the listed buildings act, buildings of merit, English Heritage (Historic England)/Cabe guidance and the consideration of heritage assets in the Royal Borough of Kensington and Chelsea.

There were minor issues raised with regard to policy wording in Policy DC4 on front mansards and hardstanding at the front of properties, Policy DC5 in relation to shopfront windows and glazing bars, Policy DC6 in relation to traditional windows, DC8 in relation to archaeological remains and DC9 in relation to advertisements on commercial buildings.

Council comment

Minor changes to clarify policies and to more clearly reflect the NPPF regarding 'substantial' harm and Public benefits have been made, in particular reference in Policy to NPPF paragraphs 133 and 134. With regard to views analysis and heritage assets in neighbouring boroughs, the Council's Tall Buildings Background Paper provides a spatial mapping exercise which uses a broad analysis of the Boroughs existing townscape and uses criteria based on EH / CABE studies to determine where tall buildings may be appropriate. More detailed visual analysis work has been undertaken as part of the planning frameworks for each area. The Study does not assess which tall buildings are considered to be successful and which are not.

Minor changes have been proposed to address other issues raised in relation to shopfronts, advertisements, archaeological remains and good neighbourliness. With regard to heritage led regeneration, the policy refers to development respecting and enhancing heritage assets, and that heritage assets should be integrated into the development to help regenerate places. Reference to the Planning (listed buildings and conservations areas) act 1990 has also been included.

Environmental Sustainability

There were a variety of comments on this subject, including general support from the GLA. There were four main issues raised. Firstly, there was a request from the Hammersmith and Fulham Air Quality Commission to break from the GLA energy hierarchy with regard to CHP (Combined Heat and Power) in order to prioritise sustainable energy sources. Secondly, the Home Builders Federation requested that the building to zero carbon homes target set by the Mayor of London was not viable and should not be followed. The third main issue was regarding waste capacity and management and a need to update the evidence base and the Local Plan text. The fourth main issue was a request to require all developments, not just major developments, that have an impact on air quality to provide an air quality assessment.

Other issues were raised against this section relating to Sustainable Urban drainage, food growing, BREEAM assessments, the 'WELL' building standards, flood source protection zones, financial contributions for mitigating air pollution, the impact of parking on air quality, floodlighting, the revoking of consents for Fulham gasholders and the proposed Counters Creek Sewage Infrastructure at Olympia.

Council comment

GLA general support is welcomed. With regard to the issue of CHP, the council intend to amend Policy CC10 to help address the concerns of the Air Quality Commission. With regard to the second main issue relating to Zero Carbon measures, major residential developments are required to meet the zero carbon target (as of October 2016). Policy CC1 adopts the CO2 reduction targets as set out in the London Plan. The inclusion of the zero carbon homes requirement is not considered to be incompatible with the NPPF's aims. In response to main issue three and Waste, the council propose a number of text changes to Policy CC6 and the supporting text to update the situation regarding waste capacity, following the production of a recent joint Waste Technical paper by the Western Riverside Waste Authorities. This includes updated text on Construction, demolition and Excavation waste management. The council also intend to reference the draft OPDC Waste Strategy following a request from the Old Oak and Park Royal Development Corporation and the Royal London Borough of Kensington and Chelsea.

In addition, some minor changes have been identified by the council to address the issues raised, including new text to clarify the council position on source protection zones, the use of the river in transporting waste and changes to the SUDs Policy and supporting text to acknowledge cyclists and pedestrians, water efficiency and impact on the river.

Transport

There was general support from respondents for the Transport policies, including from TfL. However, the main issue raised was an objection from TfL and from the Royal Borough of Kensington and Chelsea (RBKC) in relation to the council's ambitions for a Crossrail 2 Station at Imperial Wharf (South Fulham). In addition, there were a number of requests to reference other new stations and potential station locations on the West London Line, at Western Circus and to acknowledge a new station at Wilsden junction and its possible benefits to Hammersmith and Fulham. The OPDC requested that text be added to Policy T1 to reference the need for new development in the north of the borough to be connected with the OPDC area. RBKC requested minor text changes relating to the Flyunder in Hammersmith.

Other issues were raised regarding the need to use the river for transport of freight and passengers, the need for parking standards to be in line with the London Plan, the need for Policy T4 to provide clarity on blue badge provision in permit free

developments, cycle infrastructure, and the need for Transport Assessments to consider disabled access.

Council comment

Some minor changes have been identified by the council to address the points raised. However, in the case of using the river for passengers and freight and the text relating to the Flyunder in Hammersmith, it is considered that Policy T1 already includes suitable wording to cover the issues. With regard to a potential Crossrail 2 station in South Fulham, until a final decision is made regarding the route, it is considered appropriate for the council to continue to outline its ambitions. The parking standards referred to in Policy T4 and set out in appendix 7 replicate those in the London Plan and are therefore considered to be in conformity.

Planning Contributions and Infrastructure (Section 7)

This section indicates how the council intends to fund and deliver infrastructure to support the Local plan. The main issue raised in this section was the viability and deliverability of the Local Plan given the competing demands of CIL payments, affordable housing and other infrastructure requirements. Further concerns were raised with regard to infrastructure provision for Sport and for health.

Other issues raised related to the Crossrail 2 reference to South Fulham, Neighbourhood Planning and CIL, affordable rented accommodation, the publication of S106 spending and cross boundary school provision. Requests were also made to use S106 money for air quality monitors and for accessibility and inclusivity outcomes.

Council comment

The council consider that a robust viability assessment has been undertaken to support the viability and deliverability of Local Plan, which has taken into account CIL liabilities and other policy requirements. The Council recognises that each planning application will be assessed on its own merits and that viability will vary depending on the specifications of any site. The policy position, is considered to be flexibly prepared and consistent with the NPPF. The concerns raised with regard to infrastructure provision for health and sport are noted. The council has been in discussion with healthcare and sport providers and has identified infrastructure requirements in the borough through the development of the Infrastructure Delivery Plan.

Minor amendments have been proposed to address the issues raised with regard to affordable rented accommodation, reference to Hammersmith hospital and neighbourhood planning. The council will continue to work closely with neighbouring boroughs with regard to cross boundary school provision. With regard to a potential Crossrail 2 station in South Fulham, it is considered that outlining the council ambition

for a station is appropriate until such time that an alternative route and safeguarding are confirmed.

Glossary (Section 8)

There were only a handful of comments against the glossary of the Local Plan. These included requests to change the definitions for Local Buildings of Merit, Metropolitan Open Land, Employment uses, affordable housing, Public Transport Access Levels (PTALs). There was also a comment about the Air Quality Management Area definition.

Council comment

Amendments are proposed to the definitions of Metropolitan Open Land, Affordable housing, and Public Transport Access Levels (PTALs) to address the issues raised.

Appendices (Section 9)

There were a variety of comments against the Local Plan appendices. In particular, there was a detailed response on the Viability Protocol in appendix 9 with queries and recommendations concerning profit, benchmarking, review mechanisms and the growth model.

Other issues raised against the appendices included a query about the name and size of Hammersmith Cemetery, a request to refer to an upcoming review of Archaeological Priority areas (appendix 5) by Historic England and suggested amendments to the monitoring indicators for accessibility in appendix 6. The car and cycle parking standards in appendix 8 and 9 received general support, although it was requested that the council investigate a more accurate method of determining car parking requirements than bedrooms and that car parking should be reduced on developments in favour of cycle parking.

Council comment

A minor change is proposed to Appendix 9 regarding profit to address the points raised. The council consider the viability protocol to be appropriate and so no further changes are proposed. A minor change is also proposed to update the name given to Hammersmith Cemetery which is known more widely as Margravine Cemetery and to amend the size of the cemetery to 6.2 ha in appendix 3.

Other

No adverse comments were received on the sustainability appraisal or equality impact Assessment.

Conclusion

The council considers that neither the representations made on the proposed submission Local plan, nor the suggested minor and technical changes to the document, impact upon the soundness of the Local plan.

Appendix 1:

Proposed Submission Consultation Statement September 2016

London Borough of Hammersmith and Fulham
Proposed Submission Local Plan

Consultation Statement

September 2016

For further information please contact:

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1. Introduction

This consultation statement prepared in accordance with the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 sets out how the council has undertaken consultation and engagement in the preparation of the Hammersmith and Fulham Proposed Submission Local Plan and supporting documents published at Regulation 19 of the Local Plan process.

This statement also provides a summary of the main issues raised in representations received under Local Plan Regulation 18 consultation and outlines how these issues were addressed in the Proposed Submission Local Plan (Regulation 19). Full copies of the representations may be seen on the council's website.

The council has followed the consultation processes outlined in its Statement of Community Involvement which was adopted in November 2015. It has also tried to ensure that consultation has met the requirements of the Equality Act 2012. The council has worked collaboratively with other bodies to ensure that strategic priorities that cross borough boundaries are properly identified, that action is co-ordinated and that this is clearly reflected in the emerging Local Plan. The council has been conscious of the need to fulfil the duty to cooperate as set out in the Localism Act 2011. Further details of how the council co-operates with other bodies, for example through inter borough meetings, is included below and in the council's Monitoring Report for 2014-15.

2. Consultation Process

Regulation 18 consultation

The council's Proposed submission Local Plan has not only been subject to Regulation 18 consultation, but has also benefitted from a number of other forms of engagement.

The first stage of consultation for the Local Plan review ran from July to September 2013. This consultation was in advance of Regulation 18 consultation required by the Town and Country Planning (Local Planning) (England) Regulations 2012. The council especially sought comments on the way forward for the Park Royal/Old Oak area and on other topics identified in a list of 'Issues and options for review'.

In January 2015 the council undertook Regulation 18 consultation on its draft Local Plan. The council specifically consulted with the organisations, bodies and groups identified in Appendix B in order to gather their views on issues facing the borough and preferred and alternative options for tackling these issues. The consultees included specific consultation bodies and other statutory bodies, local amenity and residents' groups, businesses and individual residents.

Set out below is a summary of the consultation methods that were used in accordance with processes set out in the Regulations and in the council's Statement of Community Involvement (SCI):

- publication of the draft Local Plan (Regulation 18) document (and sustainability appraisal) and its availability for inspection at information

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points, namely the borough's main libraries (Fulham, Shepherds Bush and Hammersmith), Hammersmith and Fulham Town Hall, and its distribution to key statutory bodies and other consultees (see Appendix B for list of consultees broken down into various categories);

- letters (see Appendix A) or emails (through the Council's "Objective" consultation system) sent to all amenity and residents groups, businesses and individuals on the council's planning consultation mailing list; and
- announcement of the consultation process and availability of the Draft Local Plan (Regulation 18) and additional material on the council's website and in the local newspaper

Consultation on the Draft Local Plan 2015 under Regulation 18 followed the processes set out in the council's adopted Statement of Community Involvement and has also been in accordance with the Town and Country Planning (Local Development) (England) Regulations. The council considers that it has carried out comprehensive consultation exercises which have enabled a variety of consultees to become involved in the preparation of the Proposed Submission Local Plan.

Additional on-going consultation

In addition to the Regulation 18 consultation referred to above, the council has continued with a number of on-going working arrangements and partnerships that have engaged other local planning authorities and other organisations in the Local Plan process. This co-operation has helped to identify local and strategic issues and priorities as well as options for the way forward. Although not part of the formal consultation processes, these arrangements reveal the level of collaboration between the council and others on key matters such as the provision for new housing, the provision of infrastructure, managing flood risk and joint working on cross borough regeneration initiatives. Some examples of co-operation that have been important in the Local Plan process are described below.

(i) Joint working with surrounding boroughs and the GLA

The council is working closely with neighbouring boroughs and the Mayor of London on a number of regeneration areas where the borough will see major growth.

In respect of the Earls Court and West Kensington Opportunity Area, the council has particularly worked with the Royal Borough of Kensington and Chelsea (RBKC) on developing cross borough strategy and policies. The policies in both borough's development plans are complementary and are supported by an Opportunity Area Planning Framework SPD that was prepared in partnership with the Mayor of London, RBKC and Transport for London.

In respect of the White City Opportunity Area, the council is working in partnership with the Mayor of London. An Opportunity Area Planning Framework was adopted by both the council and the Mayor in October 2013.

In respect of the Old Oak Regeneration Area which now falls within the Old Oak and Park Royal Development Corporation, the council has worked with the Mayor of London, Transport for London, LB Brent and LB Ealing.

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The council has also worked with the Mayor of London on the 2013 Strategic Housing Land Availability Assessment, both in agreeing its methodology and in determining the housing supply monitoring target of 10,312 homes for the borough for the period 2015-2025.

(ii) Meetings with surrounding boroughs

The council has regular meetings with other West London boroughs to discuss regeneration, planning and other matters impacting upon West London. It also attends pan-London meetings, for example London Councils and the Association of London Borough Planning Officers meetings. There have also been duty to co-operate meetings with the London boroughs of Wandsworth, Richmond and Hounslow. Regular meetings also take place with the Royal Borough of Kensington and Chelsea (RBKC) on matters of cross borough interest, such as regeneration, waste, transportation and gypsy and traveller accommodation. A number of services are shared between Hammersmith and Fulham and RBKC on a bi-borough basis and with the London Borough of Westminster on a tri-borough basis,

(iii) Preparation and consultation on other council strategies

The council has consulted and engaged stakeholders on a number of strategies. It consulted on its draft Housing Strategy during January and February 2015. The consultation provides the opportunity for residents, public, private and third sector service providers, business people and others to scrutinise and contribute to the proposed housing strategy for the borough. These comments will be taken into account in the Local Plan process.

(iv) Preparation of Community Infrastructure Levy and associated material.

The council has adopted its CIL charging schedule. Consultation on the preliminary draft charging schedule was in September and October 2012. This was supplemented with further informal consultation with developers and land owners in 2013 and 2014. In August 2014 the council undertook consultation on the draft charging schedule and a public hearing took place on 10 February 2015. Adoption was in April 2015. The associated Infrastructure Plan has been prepared with the co-operation of various organisations, including infrastructure providers such as Transport for London, Thames Water and other utility providers.

(v) Resident working groups and commissions

A number of initiatives have been set up, involving a variety of bodies and leading to policy review. One example is the establishment of an Air Quality Commission – a resident-led commission to tackle air pollution in the borough. Another example of cooperation is the Hammersmith Residents Working party – this is working with the council to create a vision for the future of Hammersmith Town Centre.

Regulation 19 Consultation

Regulation 19 consultation will run from 16 September to 28 October 2016 and will meet the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement. The council will send out letters and emails announcing the

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consultation event and include relevant details of the review on its website. The Proposed Submission Local Plan and supporting documents, such as the sustainability appraisal report, will be made available on the council's website as well as in reference libraries and at Hammersmith Town Hall. The documents will also be made available to consultees where considered appropriate.

The consultees will include all those on the council's development plan mailing list. The consultation will run for a minimum of 6 weeks. The representations and the council's response will be made publicly available.

3. Summary of main issues and officer response – Draft Local Plan (Regulation 18)

The council received representations from 107 individuals, organisations and statutory consultees, including the Environment Agency, Natural England and English Heritage (now Historic England). Over 900 individual points and issues were raised. The representations may be seen on the council's website.

Below is a summary of the topics/issues that received comments, lists of the people and organisations that commented, a summary of the key issues that were raised and the council's response, with details of action arising from the consideration of the representations. The summary has been produced in document order. The document does not provide details of updated Local Plan text, such as detailed policy wording. The proposed policies and supporting text may be seen in the proposed submission Local Plan 2016 which is subject to consultation from 16th September until 28th October 2016.

General Comments (Draft Local Plan 2015)

Organisations/Individuals that commented

Marine Management Organisation; Mr Anthony Williams; National Grid; Friends of Wormwood Scrubs; Mr Greg Hands MP; Marks & Spencer plc; Home Builders Federation; Hammersmith London Bid; Pocket Living Ltd; Transport for London Commercial Development; Groundwork London; Julian Hillman; H&F Disability Forum; Woodlands Area Residents; English Heritage-London Region; Jonathan Williams.

General summary of representations

These general comments often involved organisations, such as National Grid and English Heritage, outlining their general remit and providing detail of their objectives as forerunners to more detailed comments on specific planning policy topics. More specifically, the Disability Forum commented on the need for accessibility and inclusivity to be included throughout the Local Plan in a consistent manner; the House Builders Federation requested clarification on the time scale of the Plan; and others had concerns about deliverability.

Council's response to representations

Because many of the general comments have been expanded upon by representors in specific comments, the council has responded more fully on these points elsewhere. In respect of Friends of Wormwood Scrubs, the council pointed out that this area now falls within the boundary of the Old Oak and Park Royal Development Corporation (OPDC).

Action arising from representations

- All comments on issues, topics and areas within the OPDC have been forwarded to that authority.
- The Local Plan provides more clarity on timescale.
- Glossary of terms has been enhanced.

Introduction and Hammersmith & Fulham

Organisations/Individuals that commented

Westfield Shoppingtowns Ltd; Environment Agency; West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA; Hammersmith Society; Cargiant and London and Regional; Anabela Hardwick; Hammersmith & Fulham Historic Buildings Group.

General summary of representations

Westfield Shoppingtowns were pleased to see that the Local Plan built upon earlier development plans for the borough. The Environment Agency commented that its representations should help the council in undertaking the sustainability appraisal for the Local Plan. There were calls for clarity about the relationship and status of different planning documents, more detail on the council's vision for the borough and recognition of the exhibition and events industry.

Council's response to representations

In respect of Car Giant representations, the council pointed out that this area now falls within the boundary of the Old Oak and Park Royal Development Corporation.

Action arising from representations

- All comments on issues, topics and areas within the OPDC have been forwarded to that authority.
- The Introduction and other sections have been updated to enhance their content.

Challenges

Organisations/Individuals that commented

Liberal Democrats; Port of London Authority; Pocket Living Limited; Hammersmith and Fulham Clinical Commissioning Group (CCG); Heathrow Airport Ltd; West Kensington and Gibbs Green Community Homes; West Kensington Estate TRA and Gibbs Green and Dieppe Close TRA; Groundwork London; Julian Hillman; MP Kings Retail Sarl; Greater London Authority; Hammersmith Society; Land Securities; Canal & River Trust; West London Link Design; The Regents Network; West London Line Group; English Heritage-London Region; Mr Martin Peach.

General summary of representations

A number of organisations, for example the Hammersmith and Fulham Clinical Commissioning Group (CCG) and Pocket Living Limited, confirmed or commented on the challenges facing the borough. West Kensington Estate TRA and Gibbs Green and Dieppe Close TRA made detailed comments which were particularly relevant to their estates, including the need for more social rented housing, the need to protect character and transport challenges. There was support from developers for growth, whilst others identified a need for open space and jobs for local residents.

Council's response to representations

The council has revised the section on challenges to reflect latest data on the

issues facing the borough. It has also clarified matters where necessary. In undertaking these amendments the council has liaised with relevant bodies where necessary.

Action arising from representations

- All comments on issues, topics and areas within the OPDC have been forwarded to that authority.

Spatial Vision

Organisations/Individuals that commented

Liberal Democrats; Mr Martin Peach; Westfield Shoppingtowns Ltd; Pocket Living Limited; West Kensington Estate TRA and Gibbs Green and Dieppe Close TRA; Anabela Hardwick; Hammersmith Society; H&F Disability Forum; Canal & River Trust; St Quintin and Woodlands Neighbourhood Forum; Cargiant and London and Regional; West London Link Design; West London Line Group; English Heritage-London Region; Royal Borough of Kensington & Chelsea; MP Kings Retail Sarl

General summary of representations

In general there was support for the council's spatial vision. However, a number of representors sought changes, including promoting a new station on the West London Line, a clearer Key Diagram, more detail on accessibility and inclusive design, deletion of affordable housing to buy and further detail on neighbourhood planning. The West Kensington Estate TRA and Gibbs Green and Dieppe Close TRA welcomed the council's priorities but wanted to see targets that could be measured.

Council's response to representations

The council has fine tuned its spatial vision in a number of areas, in part to reflect council and strategic partner priorities and also to expand upon priorities. The section has also been revised to take into account the establishment of the Old Oak and Park Royal Development Corporation.

In respect of requests for further detail about neighbourhood planning, the council has seen no need to expand upon this in the spatial vision. However, it is updating its neighbourhood planning web pages.

Action arising from representations

- All comments on issues, topics and areas within the OPDC have been forwarded to that authority.
- Key strategic priorities have been amended and/or enhanced.

Strategic Objectives

Organisations/Individuals that commented

The Theatres's Trust; Port of London Authority; Canal & River Trust; West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA; H&F Disability Forum; Land Securities;

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Cargiant and London and Regional; MP Kings Retail Sarl; The Regents Network; English Heritage-London Region.

General summary of representations

Representors generally supported the strategic objectives. The H&F Disability Forum requested further mention of the need for accessibility and inclusivity.

Council's response to representations

Comments noted.

Action arising from representations

- All comments on issues, topics and areas within the OPDC have been forwarded to that authority.

Regeneration Area Strategies

This section of the draft Local Plan outlined the issues and options for 5 regeneration areas in the borough which are anticipated to be the key focus for growth over the next 20 years.

Organisations/Individuals that commented

Miss Linda Moll, National Grid, West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA, Anabela Hardwick, Greater London Authority, Hammersmith & Fulham Historic Buildings Group, MP Kings Retail Sarl

General summary of representations

Comments were varied, reflecting the extent of issues and options within this section. There was general support for the recognition that the identified Strategic Sites will provide an important role in meeting employment and housing targets. However, a couple of respondents suggested that the housing capacity figures in the draft Local Plan should better reflect the targets set within the Further Alterations to the London Plan (FALP) in relation to a minimum rather than an absolute target of new homes over the 10 year period.

There were a number of specific comments related to estate renewal, the amount and type of jobs anticipated in the regeneration areas, the importance of heritage and open space in the regeneration areas and the location of National Grid cabling in these areas.

The GLA and TfL made specific comments in relation to the objectives for the Old Oak Common Regeneration Area, the road network and Hs2 petition points. They also emphasised the importance of district energy networks in the regeneration areas.

One respondent gave their support to the draft Local Plan alternative options to not actively promote the regeneration areas and strategic sites within the borough. They indicated that developing these areas according to the strategic policy would contravene the strategic objectives listed in Chapter 5 in relation to communities, the environment and transport.

Council's response to representations

With regard to housing capacity figures, it is the council's view that the draft Local

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Plan is clear in its intention to exceed the London Plan minimum targets and is therefore in conformity.

The council welcome and acknowledge the specific comments with regard to district energy networks, national grid cabling and heritage assets in the regeneration areas. In response to the amount and type of jobs anticipated in the regeneration areas, it is considered that the proposed policies represent a long term vision for the identified areas and whilst it is possible to give an indicative figure for the amount of jobs, it is not possible at this stage to predict precisely how the projected jobs will be broken down by sector and type.

With regard to the Old Oak Common Regeneration Area the comments are noted, but as of April 1st 2015 planning responsibility for the Old Oak Common Area has been taken over by a Mayoral Development Corporation. The Old Oak Regeneration Policies will therefore be removed from the Proposed Submission Local Plan. All comments related to Old Oak Common have been passed to the Old Oak and Park Royal Development Corporation.

Action arising from representations

- Footnote added to Table 1 to clarify how the Local Plan is in conformity with the London Plan regarding minimum housing targets in the regeneration areas.
- Comments related to Old Oak Common have been passed to the Old Oak and Park Royal Development Corporation. The Old Oak Regeneration policies have therefore been removed from the Proposed Submission Local Plan.

Strategic Policy – Regeneration Areas

The draft policy and alternative options set out how the council will seek to address growth in the regeneration areas, in particular with regard to housing and jobs.

Organisations/Individuals that commented

Aurora Property Group Ltd, Cargiant and London and Regional, Catalyst Housing Ltd, English Heritage-London Region, Friends of Wormwood Scrubs, Greater London Authority, H&F Disability Forum, Hammersmith & Fulham Historic Buildings Group, Hammersmith and Fulham Clinical Commissioning Group (CCG), Hammersmith Mall Residents Association, Highways Agency, Imperial College London, Julian Hillman, Liberal Democrats, Mr Anthony Williams, Mr Martin Peach, Octavia Housing, Royal Borough of Kensington & Chelsea, St Quintin and Woodlands Neighbourhood Forum, Westfield Shoppingtowns Ltd.

General summary of representations

Respondents generally supported this Strategic Policy and welcomed the targets for more housing and job opportunities as well as the provision of retail, arts, culture and leisure facilities in the identified regeneration areas. Some of the support was conditional on the council continuing to engage with key organisations such as English Heritage (Historic England) and the Hammersmith and Fulham Clinical Commissioning Group (CCG).

Respondents specifically mentioned the need for the council to consider the impact of regeneration on:

- the strategic road network
- heritage assets

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- inclusive design
- health facilities
- infrastructure delivery
- affordable housing delivery
- community churn
- open space
- the river and canal
- conservation areas

Some respondents gave their support for high density residential development schemes in the regeneration areas but other comments raised concern in relation to tall buildings in sensitive locations and the need for a clear evidence base and analysis of where tall buildings could be appropriate.

Council's response to representations

The council welcomes the support given for this strategic policy. To protect and enhance the existing townscape, heritage assets, open space and the river is a key objective of the local plan, as is the need to deliver affordable housing and new infrastructure and the regeneration policies should be read alongside other policies in the plan relating to these specific topics.

The council aims to support a coherent placing and composition of tall buildings across the Borough. The Council's Tall Buildings Background Paper includes a spatial analysis of the Borough to identify areas where tall buildings would not be appropriate and areas that may be suitable. It takes account of areas which would be particularly sensitive to tall buildings such as conservation areas, settings of listed buildings and open spaces, the riverside, and residential areas. Proposals for tall buildings would also need to meet the criteria in policy DC3 of the Local Plan, as well as Historic England/CABE guidance.

Action arising from representations

- Add 'and occupiers' to 4th bullet point of the Strategic Policy for Regeneration Areas

White City Regeneration Area

This section of the document outlined the draft policies for the White City Regeneration Area.

Organisations/Individuals that commented

Octavia Housing, Westfield Shoppingtowns Ltd, Hammersmith Society, Hammersmith & Fulham Historic Buildings Group, Land Securities, St Quintin and Woodlands Neighbourhood Forum, West London Line Group.

General summary of representations

Respondents were generally supportive of this section, but felt that some of the commentary and assumptions made regarding specific sites should be updated or changed to take account of recent planning permissions.

There was some concern raised about tall buildings and their potential impact on conservation areas and heritage assets. Other respondents felt that the tall

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buildings policy for White City was too prescriptive and should be more flexible about the location of tall buildings in the area.

Land Securities requested that a strategic site policy should be considered for the W12 Centre in Shepherd's Bush. The Hammersmith and Fulham Historic Buildings Group were supportive of a cycle and pedestrian link under the West London Line and the Hammersmith Society raised the issue of how cycle traffic will enter and exit the Westway as part of the Cycle Superhighway proposals. The West London Line Group requested that references to rail services be updated to reflect recent changes.

Council's response to representations

The council welcome the support given and will update the text where necessary to reflect actual land uses under construction and any assumptions made regarding specific development sites will be reviewed accordingly. The council will work with transport providers to understand the service and connection needs and will support these where appropriate through the Local Plan. Comments have been noted regarding the Cycle Super Highway; the council will take this into consideration when TfL consult on the proposal.

The council has not identified the W12 Centre as a strategic site but as paragraph 6.45 points out, it is considered to be a key retail anchor in the town centre. Whilst the W12 Centre is not a strategic site, this does not preclude it from future development proposals coming forward.

Action arising from representations

- Supporting text will be updated where appropriate to take account of recent planning permissions; it will also be enhanced when referring to the W12 Centre.
- Reference to Southern services will be added in relation to the West London line

Strategic Policy WCRA – White City Regeneration Area

This draft policy and the alternative options set out how the council will work to secure regeneration in the White City Regeneration Area.

Organisations/Individuals that commented

English Heritage-London Region, Greater London Authority, H&F Disability Forum, Hammersmith & Fulham Historic Buildings Group, Hammersmith Society, Imperial College London, Liberal Democrats, Mr Martin Peach, NHS Property Services Ltd. (NHS PS), Remi Serwa, Royal Borough of Kensington & Chelsea St Quintin and Woodlands Neighbourhood Forum, The Berkeley Group, Westfield Shoppingtowns Ltd, Woodlands Area Residents

General summary of representations

Respondents were generally supportive of this policy in particular the recognition that there is scope for some 10,000 new jobs, as well as the 6,000 new homes. However, it was felt that some of the commentary and assumptions made should be updated or changed to take account of recent planning permissions.

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There was support for references to Shepherds Bush Town Centre potentially being recognised as an International centre, but subject to congestion and public transport issues being resolved. It was generally felt that development in the regeneration area, in particular tall buildings, must respect the local setting, heritage assets and nearby residential areas.

Some respondents felt that the housing estates should be excluded from the Regeneration Area and people should not be forced to leave their homes. However, moving tenants who live in overcrowded or inaccessible flats, who are willing to move, was supported.

English Heritage would also like to see reference in the policy to the consideration of the positive enhancement of the heritage assets within the White City Regeneration Area.

In summary respondents requested:

- Greater emphasis on the requirement for development to provide transport capacity and infrastructure
- An update to the current SPD for White City Opportunity Area.
- Acknowledgment for the emerging St Quintin and Woodlands Draft Neighbourhood Plan
- Reference to gypsy and traveller accommodation need.
- Site policy for the White City Health Centre and the Dairy Crest site
- Extra affordable housing as part of the additional 6000 new homes
- Data to be presented on employment
- Greater density of development in high PTAL locations

Council's response to representations

The policy for White City West does not propose moving existing residents if they want to stay on the Estate, rather it is about providing more opportunities for residents who want to move to stay in the local area. The council will consider making reference to emerging Neighbourhood Plans where appropriate and where they have gained sufficient weight through the Neighbourhood Plan process.

Affordable housing will be sought on residential schemes in accordance with relevant policies in the Local Plan and London Plan. The importance of the Stable Way site to the meeting of LBHF and RBKC's gypsy and traveller accommodation need is not considered relevant to this Strategic Policy. See Policy HO10 of the Local Plan.

The council continues to work closely with Transport for London in order to understand the capacity of existing infrastructure and the need for new and improved infrastructure. Any proposals for tall buildings will need to meet the criteria in Policy DC3 of the Local Plan, with a full design appraisal of the impact of tall buildings required.

Action arising from representations

- Paragraph 6.57 will be amended to include the importance of connecting development on either side of the A40 for pedestrians and cyclists, as well as vehicles.
- Clarification and amendments to the policy regarding tall buildings The

- council will consider the need to update and re-adopt the White City SPD.
- The council will amend the text in the supporting paragraphs where appropriate to provide more up-to-date information which reflects incoming uses and implemented planning permissions and where appropriate some elaboration on positive measures to conserve heritage assets.
- Amend penultimate sentence of para 6.52 to include reference to positive measures to conserve heritage assets.

Strategic Site Policy WCRA1 – White City East

This draft site policy and the alternative options set out how the council will work to secure regeneration in White City East.

Organisations/Individuals that commented

Westfield Shoppingtowns Ltd, The Berkeley Group, St Quintin and Woodlands Neighbourhood Forum, Mr Martin Peach, Imperial College London, Hammersmith Society, Hammersmith & Fulham Historic Buildings Group, H&F Disability Forum

General summary of representations

There was general support for the strategic approach to the delivery of development in White City East. In particular, respondents welcomed proposals to include open green space in the redevelopment and the emphasis on retaining Shepherds Bush Town Centre as a major shopping area. However, respondents stressed the need to retain quality buildings surrounding Shepherds Bush Green. There was also a request for further justification for tall buildings close to the A40 and A3220 and for mitigation measures for schemes with excessive building heights. Respondents called for the railway arches to be opened up and the location of open space provision identified in the policy. The potential to increase permeability in the area was welcomed and wording suggestions were given to strengthen the policy in relation to this.

Imperial College London requested that the policy be updated to recognise the academic and research based industries that Imperial College London will bring to the regeneration area. They also noted that the provision of a north-south vehicular route as stated in the policy should give greater emphasis to other modes of transport.

Council's response to representations

The council welcome the support given for the White City East Strategic policy. The policy wording will be reviewed where appropriate to further clarify the position with regard to tall buildings, but this policy should be read in conjunction with Local Plan policy DC3 on tall buildings. The need to protect and retain heritage assets is also covered in more detail by design and conservation policies in the Local Plan. Opening up the railway arches is something that could be considered on its merits as part of a planning application and the supporting text will be amended to acknowledge this point. The council are supportive of a new park as stated at bullet point 6, and it not considered premature to specify a central location. The council will review the need to update and re-adopt the White City SPD.

The council support a mix of uses in White City East, including educational,

academic and research based uses that will be brought by Imperial College London and will update the policy to reflect this. The council are also keen to improve north to south routes in the borough for all modes of transport and will update the text where appropriate to reflect this.

Action arising from representations

- Amend the wording of paragraph 6.57 in relation to opening up the railway arches to strengthen the policy.
- Amend first bullet point of the policy as follows: - *“be mixed use providing housing, employment, including creative and academic based industries”*.
- Paragraph 6.57 will be amended to give greater emphasis to other modes of transport:

Strategic Site Policy WCRA2 – White City West

This draft site policy and the alternative options set out how the council will work with estate residents and other stakeholders to secure the renewal of the estates and the creation of a sustainable community at White City West.

Organisations/Individuals that commented

H&F Disability Forum, Hammersmith & Fulham Historic Buildings Group, Hammersmith Society, Mr Martin Peach, NHS Property Services Ltd. (NHS PS), Remi Serwa

General summary of representations

Respondents had three main concerns with this strategic policy: the proposed future uses of the Loftus Road Stadium and the TA centre; the renewal of White City Estate; and the need to consider alternative uses for the White City Health Centre.

The Hammersmith Society requested that Loftus Road Stadium and the TA centre be identified for playing fields, other sports' facilities and open space rather than a potential housing site.

The Historic Buildings Group and others would prefer to see White City Estate remain and any renewal of it to be sympathetic to the architecture and dealt with on a block by block basis. The Disability Forum commented that proposals for development and renewal of the estate should be accessible and inclusive. NHS Property Services is considering alternative uses such as housing for the White City Health Centre and they requested that the Local Plan supports these alternative uses.

Council's response to representations

The Loftus Road Stadium pitch is designated in the council's open space hierarchy (see Appendix 3 open space OS45 and Proposals Map). The council's Local Plan policy seeks to protect open spaces identified in the open space hierarchy unless development proposals realise a qualitative gain for the local community in pursuance of physical, social and economic objectives of the Local Plan (see policy OS2).

The Local Plan policies and supporting text have been amended to remove

reference to Estate Regeneration and instead refer to estate renewal with the aim of improving the estates, where possible, as part of the wider regeneration proposals.

With regard to the White City Health Centre, development proposals of this nature, if they come forward before adoption of the Local Plan, would be subject to assessment of local need and condition of the premises and its ability to be used by other community facilities, as set out in the existing policies of the adopted development plan documents.

Action arising from representations

- Amend paragraph 6.66 to remove reference to “estate regeneration” and instead refer to “estate renewal”.

Strategic Site Policy WCRA3 – Shepherd’s Bush Market and adjacent land

This draft site policy and the alternative options set out how the council will continue to support and work with existing traders for the retention and improvement of Shepherd’s Bush Market.

Organisations/Individuals that commented

H&F Disability Forum, Hammersmith & Fulham Historic Buildings Group, Hammersmith Society, Mr Martin Peach

General summary of representations

Respondents generally supported this Strategic Site policy to redevelop and improve the market and the laundry site. However comments made cautioned that if improvements are handled the wrong way, the strengths of Shepherds Bush market, especially in textiles, clothing and household linen may be lost.

Whilst the redevelopment of the market as a comprehensive plan was welcomed the Historic Buildings Group felt that the terrace of shops on Goldhawk Rd should be retained as they form part of the historic townscape.

The need for affordable housing on the site was stressed, in particular to replace the 12 units lost in the current approved scheme. The overall lack of affordable housing in the consented scheme was objected to.

The Disability Forum supported the proposed improvement of Shepherds Bush Market, but requested that proposals for any new development should be accessible and inclusive.

Council’s response to representations

The council considers Shepherd’s Bush market to be an important and distinctive part of the town centre’s cultural and retail offer. The proposed policy seeks to provide a mix use scheme which includes replacement market stalls as well as other uses.

There should be opportunities to re-provide the Goldhawk Road businesses within new high quality retail premises along this frontage and the policy will be amended to reflect such opportunities.

The council considers that it is not necessary to include "accessible and inclusive" in this site policy as it is already included in other relevant Local Plan policies.

The provision of affordable housing is a key objective of the Local Plan and will be sought in accordance with Policy H03. Reference to Policy HO3 will be added into the policy.

Action arising from representations

- Add new third bullet point into the policy in relation to the re-provision of Goldhawk Road businesses
- Add new fourth bullet point into the policy to make reference to the provision of affordable housing on the site.

Hammersmith Regeneration Area

This section of the document outlined the draft policies for the Hammersmith Regeneration Area.

Organisations/Individuals that commented

Sheila Hancock, Greater London Authority (TfL).

General summary of representations

There was support for the plans to improve the town centre, although there were some specific observations raised with regard to the Quaker meeting house and a number of comments regarding highway proposals from the Greater London Authority/Transport for London.

TfL requested that the wording in the policy and sub text be amended to take account of the repair work they are doing to the flyover, the Better Junctions Improvement Scheme they are undertaking for Hammersmith Gyratory, the need for full assessment of transport mitigation related to the Flyover proposal and that funding for tunnelling of the A4 is not included in the TfL business plan and as such the proposal would need to be entirely funded by development. TfL did comment that tunnelling the flyover could deliver improvements to the pedestrian, cycling and overall public realm in the area.

Council's response to representations

Comments regarding the need for any flyunder proposal, and/or changes to the gyratory to be subject to detailed traffic modelling are noted and reference to the need for detailed investigation of a range of issues will be maintained in the policy justification.

Comment regarding TfL's Better Junction's Improvement Scheme project at Hammersmith Gyratory is noted.

It is noted and agreed that any plans for a flyunder, reconfiguration of Hammersmith gyratory and redevelopment of key sites will need to be undertaken in an integrated manner in consultation with all affected stakeholders.

Action arising from representations

- Amend paragraph 6.78 to remove reference to 'viability'.
- Amend paragraph 6.101 to remove the reference to a specific disruption period for the Hammersmith flyover.

Strategic Policy HRA – Hammersmith Regeneration Area

This draft policy and the alternative options set out how the council will encourage the regeneration of Hammersmith town centre.

Organisations/Individuals that commented

English Heritage-London Region, H&F Disability Forum, Hammersmith & Fulham Historic Buildings Group, Hammersmith London BID, Hammersmith Mall Residents Association, Hammersmith Society, Liberal Democrats, Marks & Spencer Plc, Mr Martin Peach, Octavia Housing, Thames Water Utilities Ltd, The Berkeley Group, The Theatres Trust.

General summary of representations

Respondents generally supported the Council's approach to the Hammersmith Regeneration Area and the recognition that this location is appropriate for a higher level of development and a key focus for growth in the borough. There was specific support from the Theatres Trust to plan positively for cultural buildings and guard against the loss of cultural facilities and services.

Respondents suggested that the policy could be improved to help deliver:

- a substantial proportion of affordable new homes
- improvements to the sewerage network to support additional demand
- a replacement Cinema
- high density housing to support retail shops and restaurants
- a shopfront & retail strategy in partnership with the BID
- more modern, energy efficient office accommodation
- improved access and inclusive design for pedestrians
- improved connectivity between King Street and the Mall Conservation Area to its south
- the enhancement and protection of heritage assets

Council's response to representations

Support welcomed. Affordable housing will be delivered in accordance with Local Plan Policy HO3 which seeks a boroughwide target of 50% affordable housing on residential developments of 10 or more dwellings.

Policy HRA includes a requirement that proposals in this Regeneration Area will provide appropriate social, physical, environmental and transport infrastructure to support the needs arising from the development of HRA. However, there is no reference in the justification text to drainage issues, so additional text will be added.

The council consider that bullet point 4 of Policy HRA1 is clear on the requirement for a cinema, although it is agreed to amend the 3rd sentence of paragraph 6.86 to reiterate the requirement.

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The council note the comments made regarding better connectivity, high density housing, a retail strategy and energy efficient office accommodation. Such issues are considered to be covered by specific policies within the Local Plan, however, the council intend to produce a Supplementary Planning Document for Hammersmith Town Centre which will look in more detail at these issues and other opportunities which exist in the centre.

Action arising from representations

- Add reference to drainage issues in the justification text to the end of paragraph 6.82

Strategic Site Policy HRA1 – Town Hall Extension and adjacent land, Nigel Playfair Avenue

This draft site policy and the alternative options set out how the council will work with partners to upgrade the Town Hall Extension and neighbouring land to provide refurbished or replacement council offices.

Organisations/Individuals that commented

Hammersmith Society, MP Kings Retail Sarl, Mr Martin Peach, Mr Anthony Williams, Hammersmith London BID, H&F Disability Forum, Hammersmith Mall Residents Association, Hammersmith & Fulham Historic Buildings Group

General summary of representations

Respondents generally welcomed the approach taken in draft Strategic Site Policy HRA1 and the ambition to redevelop the Town Hall Extension site and the joined up regeneration of King Street. However, respondents felt the policy could be improved by including Hammersmith Town Hall in the policy to afford it a measure of protection against future development and/or change of use and to ensure that any development proposals are accessible and inclusive with funds secured to upgrade the town hall.

In addition respondents wanted to see policy provision for potential pedestrianising of King Street, improved connections to the river, a new cinema and the relocation of the Quaker meeting house. Respondents also emphasised the need to deliver affordable homes on this site.

Council's response to representations

The council welcome the support and comments made regarding this site policy. The Town Hall is set within the Hammersmith Regeneration Area and as such it is not considered necessary to include it in the HRA1 site policy. Its absence would not preclude improvements works from being considered and its inclusion in the site policy may cause unnecessary confusion about whether it forms part of any redevelopment proposals. It is not considered necessary to refer to "accessible and inclusive urban design" within the site policy as this matter is included in other Local Plan policies.

The council note the comments made regarding better connections to the river, a new cinema, pedestrianising of King Street, affordable housing provision and the relocation of the Quaker House. The council intend to produce a Supplementary Planning Document for Hammersmith Town Centre which will look in more detail

at the opportunities which exist in the centre.

Actions arising from representations

- Amend wording of paragraph 6.86 in relation to the replacement of the cinema to strengthen the policy- change “encouraged” to “required”.

Strategic Site Policy HRA2 – King Street East

This draft site policy and the alternative options set out how the council will encourage proposals for King Street East.

Organisations/Individuals that commented

H&F Disability Forum, Hammersmith London BID, Hammersmith Mall Residents Association, Hammersmith Society, Marks & Spencer Plc, MP Kings Retail Sarl, The Berkeley Group, The Theatres Trust

General summary of representations

Respondents generally supported the promotion of this strategic site through a policy in the draft Local Plan. However, there were a number of objections to the policy wording on building height, specifically the prevailing height and 10 storey limit included in the policy. Whilst many respondents felt that this was inflexible and would restrict development opportunities, the Hammersmith Mall residents felt that the 10 storey prevailing height had already had an impact on views in the area and that buildings should not be any taller.

Respondents sought clarification on proposed uses within the site and whether all the town centre uses detailed were required in redevelopment proposals. In addition, it was felt that the Council should not be so prescriptive in relation to the re-provision of social rented accommodation, but should remain flexible over the way it will be provided.

It was also commented that the policy should ensure that new development does not restrict existing operations, in particular leisure uses such as the Lyric Theatre. There was some support from respondents who welcomed improvements to the town centre environment through public realm, pedestrian linkages and shop front improvements.

Council's response to representations

Comments are noted. However, this policy has been removed from the Local Plan Further part of the Hammersmith Town Centre SPD and its allocation as a strategic site in the draft Local Plan is no longer necessary.

Action arising from representations

- Remove Strategic Site Policy HRA2- King Street East from Local Plan
- Prepare SPD for Hammersmith Town Centre

Strategic Site Policy HRA3 – A4, Hammersmith Flyover and adjoining land

This draft site policy and the alternative options set out how the council will work with Transport for London and other stakeholders to replace the Hammersmith

Flyover with a tunnel.

Organisations/Individuals that commented

Charecroft Estate Tenants and Residents Association, English Heritage-London Region, H&F Disability Forum, Hammersmith London BID, Hammersmith Mall Residents Association, Hammersmith Society, MP Kings Retail Sarl, Mr Anthony Williams, Ms Sheila Hancock, St Augustine's Catholic Church, Transport for London Commercial Development, West London Link Design

General summary of representations

Respondents generally supported this site policy and in particular a potential flyunder. However, residents groups indicated that they would only support a flyunder/tunnel where the land released would not then entirely be used for new high-rise development.

The Hammersmith Society and West London link both commented that the proposed Flyunder area in the policy should be extended to provide flexibility and the potential for a longer tunnel. West London Link in particular requested that the policy be open to a number of different tunnel options and financing options in order to optimise the potential to reconnect Hammersmith with the river. English Heritage commented that opportunities for enhancement in Hammersmith if the flyover is demolished are of great interest, and could be highly positive for the character of the area.

Transport for London's (TfL) suggested that Policy HR3 should be amended to clarify that the Hammersmith Broadway 'Island Site' should not be dependent on the delivery of other schemes set out in the Policy. TfL also requested that there should be an additional strategic site policy allocation specific to the Island site and additional supporting text in Policy HRA3 which promotes the redevelopment of the Island site.

Council's response to representations

Further investigations into the feasibility of a Flyunder are currently being undertaken by the council and Transport for London. The work being led by TfL will investigate the costing of delivering a flyunder tunnel – this work is separate to the local plan process. In addition, a 'Residents Working group' has been set up to discuss options for the Flyunder and for the Regeneration Area as a whole. The work to be carried out will help inform a Supplementary Planning Document for Hammersmith.

The Council acknowledge the unique opportunity for the delivery of a sustainable development in a highly accessible urban location through the 'Broadway island site's' inclusion within the Strategic Site Policy HRA 3. The Council are of the view that the site's inclusion within a broader strategic site policy (HRA3) is appropriate as it reflects Council's position that any redevelopment of this site must be integrated with and responsive to surrounding town centre sites and reflects the site's role as Hammersmith's primary public transport hub and interchange. It is however agreed that the strategic significance and redevelopment potential of the Broadway island site in relation to the role and functioning of the town centre as a whole could be emphasised further in relation to the Hammersmith Regeneration Area.

Action arising from representations

- Within the justification text, add reference to the reconnection benefits that the tunnel will have on the river and communities
- Add section on the Hammersmith Centre West Island Site into the policy

Fulham Regeneration Area

This section of the document outlined the draft policies for the Fulham Regeneration Area.

Organisations/Individuals that commented
West London Line Group

General summary of representations

West London Line commented that efforts should be made to increase accessibility to and from the Borough by seeking new direct services on the West London Line. While we do not oppose in principle the additional services suggested, these are not a priority for the Council.

Council's response to representations

The council note the comments made regarding the West London Line and agree that southern services should be mentioned.

Action arising from representations

- Add reference to Southern services in para 4.111

Strategic Policy FRA – Fulham Regeneration Area

This draft policy and the alternative options set out how the council will encourage the regeneration of Fulham Regeneration Area.

Organisations/Individuals that commented

Anabela Hardwick, Capital and Counties on Behalf of Earls Court and Olympia Group, English Heritage-London Region, Greater London Authority, H&F Disability Forum, Mr Anthony Williams, Peterborough Road and Area Residents Association, Royal Borough of Kensington & Chelsea, Thames Water Utilities Ltd, Transport for London Commercial Development, West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA

General summary of representations

There was general support for this policy, although respondents felt that it could do with further refinement and should take account of approved development. A couple of respondents suggested that the housing capacity figures in the draft policy should better reflect the targets set within the Further Alterations to the London Plan (FALP) in relation to a minimum rather than an absolute target of new homes over the 10 year period.

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There was both opposition and support for tall buildings in this policy. Residents groups commented that tall buildings should not be allowed in the opportunity area and there should be a height limit of six stories which would be more appropriate to the existing scale and character of the area. Conversely other respondents felt that the Council should place a greater emphasis on the need for development output and density to be optimised within the Opportunity Area. There was some support for the alternative option to not actively promote this regeneration area and the associated strategic sites. There was also support for wording in Policy FRA to "provide for the improvement of the West Kensington, Gibbs Green and Registered Provider estates".

Retail in the opportunity area was commented on by both residents and developers. Capital and Counties suggested that in addition to seeking to enhance the vitality and viability of Fulham Town centre, policy FRA should identify the role for complementary retailing within the opportunity area. Residents welcomed the statement in the policy that any enhancement to the North End Road market will be in consultation with market traders

English Heritage (Historic England) emphasised the need to preserve and enhance the character, appearance and setting of the grade I registered landscape at Brompton Cemetery.

Council's response to representations

The council considers that policies FRA and FRA1, as drafted, adequately reflect the objectives set out in Annex 1 of the London Plan 2015. This issue was considered by the Core Strategy Inspector and he concluded that where there was a measure of certainty on housing numbers a minimum target could be applied to the site. A measure of certainty only applies to ECWK OA and White City OA.

The council do not consider it appropriate to set a maximum height limit in this area. Tall buildings in any location will be subject to the assessment criteria proposed in policy DC3 ' Tall buildings' and other relevant policies in order to help determine their appropriateness and establish whether there is any impact on neighbouring heritage assets.

With regard to retail in the regeneration area, the council considers that bullet point 2 in FRA1 provides adequate reference to retailing for day to day needs which would complement additional retail floorspace in Fulham Town Centre.

The council will consider opportunities for enhancing the North End Road Market in consultation with the market traders. However the wording relating to the potential relocation of the market in paragraph 6.113 of the policy will be removed.

Action arising from representations

- Add footnote to Table 2 as follows: "The figures for the White City Opportunity Area and the Fulham Regeneration Area are consistent with the London Plan. In the London Plan 2015, the Earls Court & West Kensington Opportunity Area has a minimum target of 7,500 dwellings. In the figures above, 7,000 dwellings have been allocated to ECWK OA that is within LBHF and 500 to the area that is within RBKC"
- Delete text relating to the relocation of North End Road Market from

paragraph 6.113.

Strategic Site Policy FRA1 – Earls Court and West Kensington Opportunity Area

This draft site policy and the alternative options set out how the council will support the redevelopment of the Earls Court and West Kensington Opportunity Area.

Organisations/Individuals that commented

Transport for London Commercial Development, West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA, Anabela Hardwick, Royal Borough of Kensington & Chelsea, Capital and Counties on Behalf of Earls Court and Olympia Group, Mr Anthony Williams, Mr Nicolas Crosthwaite, H&F Disability Forum, English Heritage-London Region

General summary of representations

There was general support for this policy, although respondents felt that it could do with further refinement and should take account of approved development. Residents groups expressed concern that approved developments in the area could worsen road traffic and congestion on North End and Lillie Road. A couple of respondents suggested that the housing capacity figures in the draft policy should better reflect the targets set within the Further Alterations to the London Plan (FALP).

Capital and Counties suggested that the council's approach to tall buildings within the opportunity area should be more positive and that the policy wording should recognise that the impacts of appropriately located and well-designed tall buildings are not automatically harmful. Capital and Counties did support the policy with regard to retail uses in the regeneration area but noted that it should also make reference to the need for a new mixed use centre.

Local residents supported the alternative option to deal with sites separately in the Earl's Court and West Kensington Opportunity Area. Some residents objected to the redevelopment of the estates and to the statement that the West Kensington Estate has large areas of poorly laid out and underused land. Local residents also stated that the amount of social rented housing in the Opportunity Area is currently inadequate and that the Local Plan should include an ambition to increase the amount of social rented housing in the area. The Royal Borough of Kensington and Chelsea did not support the alternative option to deal with the sites separately.

Both English Heritage and the Royal Borough of Kensington and Chelsea welcomed the consideration to the need to protect the character and appearance of Brompton Cemetery and that specific reference should be made to it in policy FRA1. Other respondents commented that the West London railway corridor which is partially designated as a Green corridor and a Nature Conservation Area should be protected and enhanced.

There was some support for the ambition for a major cultural venue in the

regeneration area and that such a facility should be capable of holding trade fairs and exhibitions.

Council's response to representations

The council considers that policies FRA and FRA1, as drafted, adequately reflect the objectives set out in Annex 1 of the London Plan 2015. This issue was considered by the Core Strategy Inspector and he concluded that where there was a measure of certainty on housing numbers a minimum target could be applied to the site. A measure of certainty only applies to ECWK OA and White City OA.

The council do not consider it appropriate to set a maximum height limit in this area. Tall buildings in any location will be subject to the assessment criteria proposed in policy DC3 'Tall buildings' and other relevant policies in order to help determine their appropriateness and establish whether there is any impact on neighbouring heritage assets.

With regard to reference to a new retail centre. This issue has come up before and the council and the GLA have maintained the stance that until there is retail in this location a centre categorisation would be considered to be premature.

The Local Plan objectives are to promote estate renewal and the improvement of the estates. The council acknowledges that further clarification on the term 'renewal' is needed and will be included. The importance of consultation with the local community is recognised and the council's commitment to work with local residents and organisations in the development of policy is outlined in the council's Statement of Community involvement.

With regard to West Brompton Cemetery, detailed visual analysis work has been undertaken as part of the planning frameworks for each area. The study concludes that precise boundaries and sites cannot be identified using a two-dimensional mapping methodology, and that issues of impact on the skyline from various viewpoints would need to be studied. These would include views from all adjoining Boroughs. This will be the case for all potential locations for tall buildings- Brompton Cemetery is included here as it adjoins the regeneration area. Designated green corridors and nature conservation areas will continue to be protected under Local Plan policies.

Action arising from representations

- Update supporting text where appropriate to take account of recent planning permissions.
- Amend paragraph 6.125 which relates to the West Kensington Estate by deleting the following text: "overall the proportion of social rented housing is 78%. The estates suffer from discontinuous internal roads and there is poor integration with the surrounding area. The West Kensington Estate in particular has large areas of poorly laid out and underused communal land."

Strategic Policy SFERRA– South Fulham Riverside Regeneration Area

This draft policy and the alternative options set out how the council will encourage the regeneration of South Fulham Riverside Regeneration Area.

Organisations/Individuals that commented

National Grid, Octavia Housing, Royal Borough of Kensington & Chelsea, National Grid Property Ltd, Port of London Authority, Thames Water Utilities Ltd, Greater London Authority, The Regents Network, West London Line Group, Ptarmigan Riverside AW LLP, Mr Anthony Williams, Peterborough Road and Area Residents Association, The Berkeley Group, H&F Disability Forum, Hammersmith & Fulham Historic Buildings Group, English Heritage-London Region

General summary of representations

In general respondents welcomed the continued commitment of the council to the identification of South Fulham Riverside as a key Regeneration Area and focus for development in the Borough. However, there were some concerns raised about the location of gas pipelines, the approach taken with regard to the safeguarded wharves and heritage assets in the area, the impact of the Thames Tideway Tunnel on regeneration in the area, affordable housing delivery and the potential of the area for tall buildings.

There were a number of contrasting comments in relation to the Safeguarded Wharves. The Port of London Authority and the Regents Network raised concern that there is nothing in the policy or justification to support the increasing use of safeguarded wharves for cargo-handling. The Greater London Authority objected to the statement in the policy justification that the 'Mayor of London's Safeguarded Wharf Review in 2011/12 failed to take into account evidence submitted by H&F demonstrating the potential for consolidating wharf capacity. However there was resident support for the consolidation of wharf use detailed in paragraphs 6.139 and 6.141. Ptarmigan did not support the alternative option for the policy to prioritise the safeguarding of wharves over other land uses.

Thames Water requested amendments to the supporting text to reflect the Development Consent Order for the Thames Tideway Tunnel (2014). In particular, Thames Water objected to the implication that the tunnel would have a significant impact on the regeneration in the Carnwath Road Area. In addition, Thames Water raised concern that the sewerage network in this area is unlikely to be able to support the demand anticipated from development proposals.

Council's response to representations

The delivery of affordable housing to meet local needs is a key objective of the LBHF Local Plan. Policy H03 of the Local Plan requires residential developments of 10 or more dwellings, to provide at least 50% affordable housing.

The council acknowledges the concerns and comments raised by Thames Water. In relation to the comments regarding the Development Consent Order of the Thames Tideway Tunnel, the council will update the introductory text to the South Fulham Riverside policy.

Regarding comments by Thames Water to para 6.140, plans for the layout of the Tideway Tunnel site are still subject to discharge of requirements and it is therefore difficult to say with any certainty which parts of the site will become available for development after the Thames Tideway Tunnel has been constructed. On this basis the council has excluded the site from consideration for redevelopment for planning purposes in the Proposed Submission Local Plan.

In relation to the comments on safeguarded wharfs, the council considers that the policy is in conformity with the London Plan and London Plan policy 7.26 is referred to in paragraph 6.141. Further to this, the council has granted planning permission for the development of Swedish and Comleys Wharf, which significantly increases the wharf capacity at these sites. The council will amend the wording of paragraph 6.139 in light of the GLA's comments in relation to safeguarded wharfs and the Mayor of London's Safeguarded Wharfs Review.

Action arising from representations

- Amend first sentence of bullet point 12 as follows: “...ensuring the protection of no substantially harmful impact on heritage assets, and respect for the scale of the surrounding residential buildings, particularly to the north and east of the regeneration area”.
- Amend para 6.133 of the introductory text to the South Fulham Riverside policy in relation to the Thames Tideway Tunnel
- Amend paragraph 6.139 to reflect TfL's comments on safeguarded wharfs

Strategic Site Policy SFRR1– Imperial Gasworks National Grid

This draft site policy and the alternative options set out how the council will support the redevelopment of the Imperial Gasworks site.

Organisations/Individuals that commented

Royal Borough of Kensington & Chelsea, National Grid Property Ltd, The Berkeley Group, Hammersmith & Fulham Historic Buildings Group, Mr Anthony Williams, Peterborough Road and Area Residents Association, H&F Disability Forum.

General summary of representations

In general, respondents welcomed the identification of Imperial gasworks as a key site in the South Fulham Regeneration Area. However, there were a number of concerns raised about the policy content, in particular:-

- the absence of minimum housing targets for the site
- the absence of detail about a potential link road through the site
- the open space provision
- the protection of heritage assets and clarification of non-designated heritage assets
- the potential loss of small businesses on site
- the provision of a pedestrian access link under the West London Line
- references made to 'low and medium rise' building heights which some respondents felt was overly prescriptive and could limit the redevelopment potential of the site.

Council's response to representations

With regards to the comments about and tall buildings, the council considers that the broad parameters of this policy are sufficiently flexible to enable different design options to be considered, which is in line with London Plan policy 7.7E. The policy wording reflects the specific constraints on site and is informed by the findings of the townscape analysis which was done as part of the South Fulham Riverside SPD. However, the specific reference to 'low and medium rise' buildings

in bullet point 6 has been amended.

Any proposal that results in the loss of employment will need to be considered against the criteria in policy E2 of the Local Plan. Whilst policy SFRRA1 seeks residential led development of the site, this does not preclude compatible employment uses coming forward.

The National Grid site is located in an area that lacks sufficient open space. The draft Local Plan states that development proposals for the National Grid site should provide at least 1ha amount of public open space to support the needs of the development and contribute to reducing open space deficiency in the area. The council recognises the complexities involved in providing pedestrian access under the West London line at the southern end of the site connecting to Lotts Road. Bullet point 3 of the policy states that development proposals for the site should 'aim' to provide the pedestrian access, rather than requiring it. This will be discussed and considered as part of a planning application for the site.

Action arising from representations

- Amend bullet point 5 to make reference to consideration of other heritage assets in the surrounding townscape
- Amend bullet point 6 of policy with regards to building heights as follows: *"Ensure that building heights are generally consistent with the existing height in the townscape and respecting views along the river" predominantly low to medium rise, and represent a general reduction in scale of redevelopment from neighbouring sites located towards the riverside. There may be some scope for increased massing at a limited location towards the south east corner of the site.*
- Amend paragraph 6.151 to include sentence on non-designated heritage assets as follows: *"where non-designated heritage assets cannot practicably be retained on site, the building or structure should be fully recorded."*
- Amend bullet 4 to remove reference to a specific size of open space.

Housing

Meeting Housing Needs and Aspirations

Organisations/Individuals that commented

H&F Disability Forum

General summary of representations

H&F Disability Forum welcomed the council's revised housing strategy that includes percentages for affordable housing in conformity with the London Plan 2011.

Council's response to representations

Council welcome the support

Action arising from representations

None

Borough-wide Policy H01 – Housing Supply

Organisations/Individuals that commented

Royal Borough of Kensington & Chelsea, Westfield Shoppingtowns Ltd, Home Builders Federation, Universities Superannuation Scheme Limited, Catalyst Housing Ltd, Transport for London Commercial Development, West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA, Hammersmith Society, National Grid Property Ltd, St Quintin and Woodlands Neighbourhood Forum, Octavia Housing, Greater London Authority, Hammersmith Society, Mr Anthony Williams, Mr Martin Peach, The Berkeley Group, H&F Disability Forum, Ptarmigan Riverside AW LLP, Cargiant and London and Regional, Aurora Property Group Ltd, English Heritage-London Region

General summary of representations

Comments varied, reflecting the extent of issues and options within this section. There was general support for policy H01 on the delivery of housing throughout the borough and the promotion of the key regeneration areas as the principal locations for the delivery of residential development. It is considered that the Local Plan provides policy support to develop much needed family housing and to make a significant contribution to the Council's housing target.

There was a request by several respondents for further explanation of how the NPPF and NPPG requirements have been met and one of the respondents requested further information regarding how the housing market area has been defined for LBHF. Several of the respondents noted that that even though the SHMA produced for 2014/15 provides useful information, it is focused upon Hammersmith rather than considering the needs across a wider HMA and it also does not consider cross boundary issues.

There were conflicting opinions regarding the London Plan target to provide a minimum of 1,031 additional dwellings a year, which has also been adopted by Policy HO1. One of the respondents consider that Council's housing requirement, which matches the target in the London Plan 2016, to be a sensible and positive planning response to the scale of the housing need problem in London. However, there was a request for further elaboration in the plan that these are minimum

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housing targets as opposed to indicative ones. One of the respondents raised concerns that the borough is already densely populated and therefore exceeding the annual London Plan target is considered unnecessary and its impact would reduce the quality of life for existing residents.

Several of the respondents suggested changes to criterion 3 of the policy to reflect the wording of Paragraph 22 of the NPPF, and to provide further flexibility by encouraging the optimisation of windfall sites, and the intensification of underutilised developable sites during the plan period. These would assist with significantly increasing the supply of housing, and therefore aligning with the intentions of the NPPF. Another respondent disagrees with criterion 3 which requires land to be “surplus” to the requirements of other land uses as this is not in accordance with the NPPF and with the stated intentions for the OORA.

One of the respondents recommended changes to the supporting text on what steps the Council is taking to monitor the 'Buy to Leave' trend and whether it will be introducing policies to prevent this aspect of the London housing market. Another respondent suggested deleting the reference to ‘...is not lost to other uses...’ in relation to existing housing as it is considered too prescriptive.

Greater London Authority welcome the council's commitment to exceed the London Plan minimum housing target set out in policy H01 and Table 2. However they note that London Plan Policy 3.3 part requires boroughs to augment where possible their housing targets with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF.

One of the respondents disagreed with the alternative option to allow more employment land to be redeveloped for housing as communities are best mixed with employment, workshops, shops and other facilities.

One of the local residents suggested an additional policy to acquire housing left empty. Any housing acquired by this route could then be sold on to a partner RSL for social letting.

H&F Disability Forum raised concerns that the wheelchair accessible/adaptable housing requirements do not guarantee that they are occupied by wheelchair users or people with mobility impairments, particularly if they are market housing. Subsequently, it was strongly recommended that the council works with developers, landowners and estate agents to maximise sales of wheelchair units to households that will benefit from them and see wheelchair housing marketed proactively in mainstream marketing media.

One of the respondents made specific comments in relation to OORA and consider there to be an opportunity to delivery additional homes beyond those envisaged by the Council over the plan period.

Council's response to representations

The council welcomes the support given for this policy. In regards to compliance with London Plan policy 3.8, the council considers that it has carried out a robust Housing Market Assessment and that the London Plan does not require boroughs to carry out an assessment of overall housing need or explicit analysis of the housing market area. The Council has taken into account the London SHMA and the housing market area in preparing its H&F HMA.

In response to the request by the Royal Borough of Kensington & Chelsea to undertake a joint SHMA, the Council advises that the CLG Final Report on the

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Geography of Housing Market Areas and supporting documents identified a lower tier of local housing market areas for London. LBHF is included in London (West) housing market area and RBKC is in London (North Central). There is no firm evidence that RBKC and LBHF form a single housing market area. As a result, Council can see little benefit in carrying out a joint SHMA with RBKC at this stage, however, officers will continue to co-operate with RBKC in assessing local housing needs.

The Council advises that LBHF's London Plan housing target significantly exceeds the projected increase in the households in H&F between 2011 and 2036 and that the London Plan requires boroughs to exceed the London Plan target. Hammersmith and Fulham therefore is already significantly contributing to meeting London's need for additional housing (see background paper: Housing Policy). In addition, the Council will monitor the London Plan target by monitoring housing completions and approvals in both the Borough and in the Regeneration Areas.

In regards to providing further flexibility to criterion 3, the Council agrees that underutilisation could be a factor that allows for residential development, however the council considers that there is no need to make the suggested change to policy HO1. Other policies in the plan (and the London Plan) will allow for intensification of sites where this is appropriate, and therefore there is no need to include reference in the policy.

In response to the concerns raised about the 'Buy to Leave' trend, the Council is committed to using its planning powers to ensure that new housing is not marketed solely as an investment opportunity for overseas buyers. The Council is intending to prepare a 'Buy to Leave' SPD as part of the implementation of this commitment which is a London wide as well as LBHF issue. Policy H01 has also been amended to include a new criterion to ensure that vacant homes and new homes are occupied. Additional justification text has also been included which refers to the Mayor of London's New Homes for Londoners Concordat which commits them to making homes in their developments available for sale to Londoners before or at the same time as they are available to buyers from other countries.

In response to the development of windfall sites to help achieve the housing targets, the Core Strategy Inspector concluded that where there was a measure of certainty on housing numbers, a minimum target could be applied to the site. A measure of certainty only applies to ECWK OA and White City OA. An additional footnote has been added to Table 2 to confirm this.

In regards to the request to delete the reference '... is not lost to other uses ...'. Council notes that this is in accordance with London Plan policy 3.14 and that the loss of existing housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.

The wheelchair accessible/adaptable housing requirements have been addressed through amendments to Policy HO6 Accessible Housing and supporting text as detailed later in this report.

With regard to the Old Oak Common Regeneration Area the comments are noted, but as of April 1st 2015 planning responsibility for the Old Oak Common Area has been taken over by a Mayoral Development Corporation. All comments related to Old Oak Common have been passed to the Old Oak and Park Royal Development Corporation.

Action arising from representations

- Amend criterion 3 in Policy H01 to read: *The development of windfall sites and the change of use of buildings where ~~land and premises are shown to be surplus to the requirements of other land uses~~ there is no reasonable prospect of that site and/or premises being used for that purpose.*
- Add an additional criterion to Policy H01 that housing targets will be achieved by: *working to return vacant homes to use and ensure that new homes are occupied.*
- Add a footnote to Table 2 to highlight the minimum targets outlined for the regeneration areas.
- Additional justification text to refer to the Mayor of London's New Homes for Londoners Concordat.

Borough-wide Policy H02 – Housing conversion and retention

Organisations/Individuals that commented

Octavia Housing, West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA, Mr Anthony Williams, Mr Martin Peach

General summary of representations

There was strong support for policy H02 in relation to housing conversions and strong opposition to the alternative approaches.

A local resident raised concerns that that the 50% requirement for 2 bedroom housing is not always feasible in conversions and that it should be made an objective. Also, not all housing is considered suitable for families such as flats above shops. This respondent also noted that the policy on parking permit free is being overturned at appeal on a monotonous basis and consequently recommends that additional evidence is required to back up the policy.

A respondent also questioned how the council will deal with conversion of B1 to housing use if the current development rights are terminated and whether there should be a particular policy to address this.

Council's response to representations

The support is welcomed and the council advises that the 50% requirement for 2 bedroom housing is currently included in the existing Development Management Local Plan and there is no evidence for a policy change. With regard to suitability of housing for families, the supporting text notes that there will be flexibility and each case will be assessed on a site by site basis.

The permitted development rights for loss of B1 offices to residential was scheduled to cease in May 2016, but has been extended by the Government. The council is proposing to introduce an Article 4 direction to take away the permitted development rights.

Action arising from representations

- Add a new criteria to read: *"in streets where there is less than 10% night-time free space the number of additional dwellings may be restricted or conditioned to allow no additional on-street parking."*

Borough-wide Policy H03 – Affordable Housing

Organisations/Individuals that commented

Octavia Housing, Westfield Shoppingtowns Ltd, Home Builders Federation, Catalyst Housing Ltd, West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA, Greater London Authority, National Grid Property Ltd, Capital and Counties on Behalf of Earls Court and Olympia Group, St Quintin and Woodlands Neighbourhood Forum, Mr Anthony Williams, Peterborough Road and Area Residents Association, Mr Martin Peach, Imperial College London, Pocket Living Limited, The Berkeley Group, H&F Disability Forum, Ptarmigan Riverside AW LLP, Aurora Property Group Ltd.

General summary of representations

There is general support for Policy HO3 and that the mix of tenures will take into account site size, site constraints and financial viability. Two of the respondents also supported the scope to provide affordable housing off-site via a financial contribution. There were several requests for further clarification and amendments to the supporting text in relation to point (d) of Policy HO3 and how the council is intending to achieve affordable rented and social rented housing in ways that enable tenants to move into home ownership. Also what evidence the council would require from developers in order to satisfy the requirement in regards to cash in lieu contributions. One of the local residents requested for further analysis of how recent consents for large residential schemes have impacted on the proportion of social rented and affordable housing.

One respondent supported the policy but felt that affordable housing should be clearly defined and cater for households earning less than the maximum £60,000pa mentioned in the Glossary. Also, the financial viability studies should be transparent and made public. One of the local residents requested that Council defines affordability and raised concerns that intermediate rent at 80% of market rent is not affordable for those on average earnings.

There were a range of comments which challenged the consistency of proposed policy HO3 with the national policy. One of the respondents felt that Part E is unjustified and contrary to national policy as the Council cannot negotiate for a higher proportion of affordable housing than is set out in its plan. Another respondent made the observation that there is clear Government policy for affordable rent to replace social rent and therefore suggested revising policy H03, or the supporting text, to be consistent with regional policy allowing for flexibility for a range of tenures.

Home Builders Federation provided a detailed submission making the following comments:

- The CIL viability report has made no allowance for the changes to the Building Regulations, in particular the requirement for zero carbon homes in 2016;
- The £1,000 per dwelling which has been allowed for the S106/S278 planning obligations to be remarkably low. They have requested further evidence to justify this modelling assumption and clarification whether this allowance includes the 40% affordable housing contribution;
- Council's last Affordable Housing Viability Study was prepared in 2009 and needs to be updated in support of the Draft Local Plan. This was also raised by several other respondents.

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- The viability of development is calculated on the basis of 'profit on cost' rather than 'Gross Development Value' (GDV);
- The policy will need to be amended to comply with the recent changes to national policy which will exempt schemes of 10 units or fewer from affordable housing obligations.

There were a number of contrasting comments in relation to the proposed tenure split. The Greater London Authority supported the borough wide target of 40% for affordable housing and the tenure split of 60% for social or affordable rent and 40% for intermediate housing. However, one of the respondents considered that the borough wide target of 40% is low and that this figure should be reconsidered to be in line with the London Plan target of 50%. Whereas another respondent suggested that a lower target would be more realistic and offer a greater opportunity to achieve compliance. Several respondents requested that the policy be amended to be more flexible in order to enable a site specific assessment of the appropriate affordable housing mix having regard to housing needs, viability and the benefits of the proposed mix of tenures. One respondent was in support for the alternative option of providing differential affordable housing targets in different parts of the borough.

There were also numerous responses which questioned the proposed tenure split between social and intermediate housing. One of the respondents considers that the proposed target does not sufficiently address the current deficit in intermediate housing. There were several requests for further evidence to support this ratio as it does not reflect the modelling in the CIL viability assessment which models 70% intermediate and 30% affordable rent.

There was general disagreement with point c) as it was considered that typically, in new build developments, affordable homes will be situated in cores to increase the viability of the project and the level of affordable housing to be provided. Therefore the recommendation was for Policy HO3 to allow for small clusters and cores and that the size of these should be determined on a site by site basis.

H&F Disability Forum generally support the affordable housing policy, however, they raised concerns that disabled people will not benefit from the affordable housing policy unless they are a priority category for new social rented or affordable rented housing at lifetime homes or new wheelchair accessible/adaptable standard. They suggested that this needs to be reflected in the Equality Impact Assessment and that point e) of the policy includes an additional criteria for evidence of need from Strategic Needs Housing Assessment.

Council's response to representations

The council welcome the support made regarding this policy. Council monitors approvals and completions annually in the Authority's Monitoring Report and it has been observed that the social affordable rented stock has increased over the last 5 years from 25,900 (Core Strategy para. 8.18) to 29,620 in H&F HMA (section 6). The proportion has increased from 33% to 35.2%.

It is noted that a previous viability assessment was carried out as part of the consultation and adoption of the CIL Charging Schedule. The CIL Viability Study was updated in 2014/15 and the council has commissioned an affordable housing viability assessment to support the new borough wide target of 50% put forward in the Proposed Submission Local Plan.

In regards to the CIL viability report, the council advises that the appraisals modelled a s106 rate of £1000 per private residential unit. Additional s106 modelling

for the South CIL zone, where the highest rates of CIL apply, was also undertaken. This modelling assumed rates of £50psm and £100psm instead of the £1000 per private residential unit. The results for all these modelling assumptions showed there was a sufficiently large 'overage' left over that could accommodate any additional s106 needed to address any abnormal s106 planning obligations.

The reason for using profit on cost rather than Gross Development Value (GDV), is that the modelling of profit is based on cost at a rate of 20% across all residential scenarios. If profit were to be modelled on GDV, a different profit level would need to be applied to private and affordable housing in order to reflect the different levels of risk associated with providing these tenures. This matter is discussed in Section 9 of the January 2015 Viability Study Addendum and was accepted by the independent CIL examiner.

In regards to carbon homes, the council notes that in July 2015, in its 'Productivity Blueprint' the Government signalled its intent to neglect the Zero Carbon policy. Notwithstanding this recent announcement, the Council's CIL Charging Schedule was subjected to a public examination which was approved and will take effect from 1 September 2015. During the examination, the council satisfactorily demonstrated that the proposed CIL rates were based on 'appropriate available evidence' as defined in statutory planning guidance. Furthermore, the proposed CIL rates were shown to contain a sufficient buffer to support development when economic circumstances change.

In response to the proposed affordable housing targets and tenure split:

- Council has commissioned a viability assessment to support increasing the affordable housing target to 50%.
- Policy HO3 is flexible. It states that 60% of affordable housing should be social or affordable rent. It does not prioritise social rented housing and is in conformity with London Plan policy 3.11.
- Part E gives flexibility to the policy as required by paragraph 22 of the NPPF
- The tenure split proposed in Policy HO3 was not modelled in the CIL Viability Study as the draft Local Plan is not part of the 'relevant plan' for CIL purposes. The viability impacts of Policy HO3 will be assessed as part of the affordable housing viability assessment commissioned for Local Plan.

The council's intention to achieve affordable rented housing is reflected in H&F's Housing Strategy – Delivering the Change we need in Housing, where section 3.6. states that *"The Council will therefore explore a scheme in which tenants can use their rent payment to build up a notional 'share' in their home which they can cash in and 'sell' back to their landlord when they move out into home-ownership."*

In response to the concerns raised by H&F Disability Forum, the Housing Allocation Scheme will be amended to ensure that Housing Register applicants who require wheelchair accessible housing will have priority for such housing. In addition, the Joint Strategic Needs Assessment will assess the need for housing for vulnerable people.

In regards to the policy on cash in lieu, this is considered to be similar to that of the London Plan. This document outlines examples of exceptional circumstances (see para 3.74) where cash in lieu and pooling may be appropriate. It is considered unnecessary to repeat this information in the Local Plan. Council also considers it unnecessary to refer to vacant building credit in the policy; however, reference will be made in the supporting text.

Action arising from representations

- Amend Policy H03 to increase the borough wide target for affordable housing to 50%.
- Amend criteria e) as follows: *In negotiating for affordable housing and for an appropriate mix of social and affordable rented and intermediate housing in a proposed development, the council will seek the maximum reasonable amount of affordable housing and take into account.....*
- Amend criterion d) to remove the words 'council will encourage'
- Add supporting text that in schemes of 9 or less units, the council will negotiate for affordable housing where there is considered to be capacity for more units and taking into account the guidance included in London Plan Policy 3.13.
- Add supporting text to make reference to Starter homes and that where Starter Homes are substituted for affordable housing in development proposals the Council will expect them to replace affordable home ownership products (primarily shared ownership) rather than affordable rented housing.

Borough-wide Policy H04 – Housing quality and density

Organisations/Individuals that commented

Octavia Housing; National Grid Property Ltd; Liberal Democrats; Mr Martin Peach; Pocket Living Limited; The Berkeley Group; H&F Disability Forum; Aurora Property Group Ltd

General summary of representations

There is general support for Policy H04 and the need for providing good quality high density developments. One of the respondents suggested that increased housing could be provided if developments are allowed to have fewer car spaces in exchange for additional cycle parking and/or support car sharing/renting schemes.

One of the respondents was supportive of the Councils assertion that acceptable housing density will take into account the London Plan policies and be subject to public transport and highway impact and capacity. They also suggested that identification of certain developable sites within the borough may merit higher densities beyond those identified within the London Plan density matrix criteria. There was also a request for further support and flexibility for higher density residential developments having regard to the quality of design in order to optimise the potential of the sites.

One respondent considered that the references to 'predominantly low to medium rise' and 'small scale developments' was imprecise and potentially confusing when read alongside the policies for those areas. Subsequently, recommended that the paragraph excluded Regeneration Areas and instead referred the reader to the relevant 'area specific' policies on design to avoid potential conflict or uncertainty between the two. Another respondent raised concerns that the references to 'low rise' fails to take into account the capacity projection for the regeneration area and that constraining the density of development sites in regeneration areas will impact on the number of homes being delivered and may result in the Council failing to achieve its housing and employment targets. Two respondents referred specifically to the capacity and future development of Old Oak Regeneration Area.

Consultation Statement

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A respondent raised concerns with the supporting text which states that it is important for new housing to meet standards on matters such as room size and amenity space. They recommend that clearer definition needs to be included to highlight the London Plan standards.

H&F Disability Forum requested a wording change to the policy to insert new sentence that requires all new housing to meet Lifetime Homes standards and wheelchair housing standards.

Council's response to representations

The council welcome the support and considers it appropriate to refer to regeneration areas in this policy as it will assist readers and guide them towards other relevant policies in the Local Plan. Furthermore, the regeneration area policies and Policy DC1 – Built environment – identify locations for tall buildings

The council also notes that Policy HO4 states that it takes account of London Plan policies and that new housing will be required to meet the requirements of both Policy HO4 and HO6. There is no need for a cross reference between the two policies. In addition, the second paragraph of policy HO4 clearly states that internal space standards should accord with the London Plan.

With regard to the Old Oak Common Regeneration Area the comments are noted, but as of April 1st 2015 planning responsibility for the Old Oak Common Area has been taken over by a Mayoral Development Corporation. All comments related to Old Oak Common have been passed to the Old Oak and Park Royal Development Corporation.

Action arising from representations

- Delete '*small scale*' in 1st sentence of 5th para of the policy
- Amend supporting text to refer to the Mayor's housing standards as set out in Table 3.3 of the London Plan (2016) but also note that developers are encouraged to exceed these, so as to assist in providing a mix of sizes.
- Remove reference to the 'Code for Sustainable Homes' in Policy H04.

Borough-wide Policy H05 – Housing mix

Organisations/Individuals that commented

Octavia Housing, National Grid Property Ltd, Capital and Counties on Behalf of Earls Court and Olympia Group, Liberal Democrats, Imperial College London, Pocket Living Limited, The Berkeley Group, Aurora Property Group Ltd.

General summary of representations

There is general support for Policy HO5 and that it does not propose a rigid target housing mix for market housing. However, there was strong objection from several respondents that advised that family accommodation is not suitable in all locations and developments and therefore should only be required in appropriate schemes. It was also recommend that rather than applying a rigid target mix, the type and size of social rented and intermediate housing be delivered on a site by site basis taking into account local needs, market demand and the character and location of the site.

One respondent raised concerns as to the basis for the housing mix for the affordable rent and intermediate tenures and what evidence base that underlies this.

Consultation Statement

Proposed Submission Local Plan

Pocket strongly supports the Council in its objective of working with Registered Providers and other house builders in order to increase the supply and choice of high quality residential accommodation that meets local residents' needs and aspirations and demand for housing. However, they raised concerns that the targets in this policy would not align with Pockets strategic objectives which are to provide opportunities for those first time buyers living and working within the borough who are unable to access market housing the opportunity to purchase an affordable first home.

Council's response to representations

The council welcome the support and note that the H&F HMA has identified that there is a need for larger affordable dwellings and as a result this has informed the housing mix. The policy is also in conformity with London Plan policy 3.8 which seeks the provision of affordable family housing.

The H&M HMA demonstrates that the overriding need for affordable housing is family size accommodation and that over 500 households on the Homebuy Register require 3+bedrooms. In addition, it is considered that Hammersmith and Fulham already has a stock of non-family affordable housing. The policy is considered to be sufficiently flexible to consider schemes such as Pocket Living.

Action arising from representations

- Amend justification text to highlight the importance for accommodation to come in a variety of sizes and bed spaces to assist in meeting housing needs.

Borough-wide Policy H06 – Accessible housing

Organisations/Individuals that commented

Octavia Housing, Greater London Authority, H&F Disability Forum

General summary of representations

There is general support for Policy HO6 and the thresholds for wheelchair accessible housing, lifetime home standards and parking spaces for blue badge holders.

Greater London Authority made specific comments in relation to technical matters relating to the appropriate Building Regulations. H&F Disability Forum support the policy but raised concerns with car parking requirements.

Council's response to representations

The council welcomes the support and notes that the supporting paragraphs to policy HO6 have been amended to reflect policy changes. The council also note that car parking is dealt with in policy T6.

Action arising from representations

- Amend policy HO6 to set out the specific requirements for high quality accessible homes and make particular reference to Building Regulation requirements for accessible and adaptable dwellings and wheelchair user dwellings.

- Amendments to the supporting text which makes reference to the Building regulation requirements in regards to accessibility of new homes to people with mobility difficulties.
- The policy and justification text has removed all reference to Lifetimes Homes standards.
- Amendments to justification text to advise that 'Wheelchair accessible dwellings' which are designed to be readily useable at the point of completion will only be required for those dwellings where the council is responsible for allocating or nominating a person to live in that dwelling. The remaining dwellings should be 'wheelchair adaptable' and built to be easily adapted to meet the needs of a household that includes a wheelchair user.

Borough-wide Policy H07 – Meeting needs of people who need care and support

Organisations/Individuals that commented

Tri-Borough Public Health, Octavia Housing Greater London Authority, Liberal Democrats, H&F Disability Forum

General summary of representations

There is general support for Policy HO7 and that 'special needs housing' needs to be protected. However, one of the respondents raised concerns that the policy does not account for the aging population. Greater London Authority welcome that the supporting text references the borough's indicative benchmarks for specialist housing for older people, however note that the policy does not address what actions the council will take to meet this need.

H&F Disability Forum note that Tri-Borough Public Health is commissioning a deep dive in early 2015 to inform the JSNA on housing for vulnerable and older people. They expect this to provide evidence and information on the number and tenure of supported housing required to meet the needs of vulnerable adults and older people to support this policy and provide evidence in accordance with the NPPF. They also raised concerns that the final bullet in policy HO7 and the supporting text may result in refusal of a planning application on the basis that any extra use of local services is detrimental.

Council's response to representations

The council welcomes the support and notes that the H&F HMA assesses the need for specialist housing and that this can be updated when the JSNA is produced.

In regards to the last bullet point in policy HO7, Council notes that it needs to be able to consider the impact of large special housing schemes on amenity and local services and that it is one of a number of criteria that will be considered.

Action arising from representations

- Enhancement of policy HO7 regarding protection of special needs housing.
- Amend the policy so that where relevant, it will be necessary for evidence of lack of need to consider the full range of special needs, including the frail elderly, people with physical and learning difficulties, and people needing short term support.
- Add additional text to the justification text that the Council is working with residents, NHS and other providers to deliver new types of private and social sheltered housing which will include on-site home and medical care".

Borough-wide Policy H08 – Hostels and houses in multiple occupation

Organisations/Individuals that commented

Octavia Housing, Greater London Authority, H&F Disability Forum

General summary of representations

There is general support for Policy H08. Greater London Authority request that the borough should take into account the strategic as well as local importance of houses in multiple occupations. H&F Disability Forum recommended that criteria for new hostels and HMOs housing should include reference to BS 8300:2009.

Council's response to representations

Council welcomes the support and advises that priority will be on local need and do not consider that any change to the policy is considered necessary.

Action arising from representations

- No changes proposed

Borough-wide Policy H09 – Student accommodation

Organisations/Individuals that commented

Octavia Housing, Greater London Authority, Hammersmith Society, Liberal Democrats, Imperial College London, H&F Disability Forum, Cargiant and London and Regional

General summary of representations

There is general support for Policy H09 and the Council's commitment to assist in meeting the London-wide need for student accommodation. One of the respondents requested a change to the supporting text to ensure that students do not take housing available for residents. Another respondent made the observation that students tend to have more bicycles than the average Londoner and therefore consideration should be given to providing increased level of cycle parking in student developments.

Imperial College London support the policy and note that the supporting text rightly recognises that Imperial College has a particular need in view of its facilities at both Hammersmith Hospital and Charing Cross Hospital, as well as the development proposed in the White City Opportunity Area.

The Greater London Authority noted that the Further Alterations to the London Plan introduce a requirement for the delivery of affordable student accommodation where there is not an undertaking with a specified academic institution(s) and have requested that this requirement is included in Policy H09.

H&F Disability Forum note that the current LBHF policy is that 10% student bedrooms should be wheelchair accessible and therefore request changes to the supporting text as appropriate.

Council's response to representations

The council welcome the support and consider that part c) of the policy and the justification text make it clear the criteria that will be considered to ensure that student housing does not take housing available for residents.

In regard to bicycle demand for students, the council notes that the proposed standard for boarding schools, residential colleges and student halls of residence is one cycle parking space per student and considers this to be adequate to meet demand. Furthermore, the standards are minima, so if demand indicates that a greater number is required additional spaces can be negotiated.

Action arising from representations

- Add additional text to bullet point f) in the policy to read "...or an element of affordable accommodation in accordance with the London Plan".
- Amend supporting text as recommended in regards to wheelchair accessibility.

Borough-wide Policy H010 – Gypsy and traveller accommodation

Organisations/Individuals that commented

Octavia Housing, Royal Borough of Kensington & Chelsea

General summary of representations

There was general support for this policy however Royal Borough of Kensington & Chelsea consider it premature to reject the alternative option to "Identify sites in the borough to meet the need for additional pitches" in advance of the joint Gypsy and Traveller Accommodation Needs Assessment (GTANA) being completed.

Council's response to representations

With regard to additional pitches, the joint GTANA is now completed, but is subject to a further survey of the Westway site to take account of the change in definition of Travellers. The council will continue to discuss how to meet identified need with RBKC.

Action arising from representations

Refer to results of the GTANA in supporting text.

Previous Borough-wide Policy H011 – Basement accommodation and lightwells

Organisations and Individuals that commented

Ms Sheila Hancock, Octavia Housing, Thames Water Utilities Ltd, Sue Gluck, Emma Juhasz Hammersmith Society English Heritage-London Region, Mr Anthony Williams, Peterborough Road and Area Residents Association, Liberal Democrats, Mr Martin Peach, English Heritage-London Region

General summary of representations

There is general support for Policy DC11. Thames Water supports the policy and that it requires new basement development to provide active drainage devices. Several of the local residents raised concerns with the level of noise and disruption

during construction, the impact on adjoining properties and also the increased flood risk as a result of basement construction.

English Heritage-London Region supports the reference to the historic environment within the policy. However, they raised concerns with the creation of lightwells and how this can affect the character of conservation areas and the setting of listed buildings and requested that the supporting text be amended to provide more detail as to how harm to heritage assets will be defined, and the policy applied. They also advised that the Greater London Archaeological Advisory Service wish to be consulted on applications where there are potential sensitivities, and in every case in APAs.

Council's response to representations

The support is welcomed by council. In regards to flood risk, the council notes that the Environment Agency's (EA) guidance on consulting them on minor planning applications in Flood Zone 3 is to use their standing advice unless the proposal is within 20m of the Thames and/or unless the proposal creates a more vulnerable use in terms of flood risk. Adding a basement extension to an existing dwelling does not change its flood vulnerability classification as outlined in the Planning Practise Guidance although there would be a need to waterproof the basement extension. Even though the EA is not consulted, an application of this sort would still need to carry out a Flood Risk Assessment and provide this to the council for approval. Whereas self-contained basement flats are considered to be highly vulnerable in relation to flood risk.

In addition, the council follows the advice provided by the EA in relation to when to consult them on planning applications. Council also makes our own assessments of flood risk issues for all planning applications in Flood Zones 2 and 3 and some applications in the low risk Zone 1. Most planning applications require a Flood Risk Assessment to be submitted.

Basement development provides opportunities to create new accommodation and additional living space in existing homes. The council considers it appropriate to allow basement development, provided a range of policy requirements are met including criteria related to the size of the basement, its impact on neighbouring properties and disruption associated with the duration of construction. Policy H011(now Policy DC11) has been significantly amended (see actions below) to address the points raised. Additionally, basement developments must meet Borough-wide Policy CC3 relating to Reducing Water Use and the Risk of Flooding.

In regards to heritage, the impact of lightwells on the character and appearance of conservation areas, and issues of detailed design are covered in the Planning Guidance Supplementary Planning Document

Action arising from representations

- The policy has been moved from the Housing chapter of the Local Plan (policy HO11) to the Design and Conservation chapter (policy DC11)
- Amend first sentence of policy DC11 to read: "*New basements and extensions to existing basements: accommodation in existing dwellings will only be permitted where they:*"
- Change criteria (a) and amend
- Add a new criteria (c)
- Change bullet point two into criteria (d) and amend
- Change bullet point three to criteria (e) and amend

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- Delete bullet point four (now criteria f)
- Add new criteria (g) (h), (i), (j), (k), (l) and (m) into the policy
- Amend and add additional information to the justification text in relation to the size of basements, flood risk, demolition and construction and lightwells.

Borough-wide Policy H012 – Detailed residential standards

Organisations/Individuals that commented

Tri-Borough Public Health, Octavia Housing, H&F Disability Forum

General summary of representations

There is general support for Policy H12. H&F Disability Forum note that the Nationally Described Space Standard is a different standard from the London Plan minimum space standards and recommend that the council adopt the London Plan minimum space standards. They also recommend that detailed residential standards must include Lifetime Homes and wheelchair accessible standards.

Council's response to representations

Council welcome the support and note that the Minor Alterations to the London Plan has adopted the Nationally Described Space Standard. In addition, the bullet points list all the considerations that will be taken into account when considering residential applications, and they do not override specific policies such as HO6.

Action arising from representations

None

Local Economy and Employment

Borough-wide Policy E1 – Providing for a range of employment uses

Organisations/Individuals that commented

Transport for London Commercial Development; National Grid Property Ltd; Capital and Counties on Behalf of Earls Court and Olympia Group; Imperial College London.

General summary of representations

There was general support for this policy, although this was subject in some cases to requests for amendments to the policy and supporting text. Transport for London Commercial Development wanted the policy to encourage renewal of underutilised employment sites and also requested that acceptability of office development should be based on public transport accessibility rather than restricted by geographical area; National Grid objected to the retention and intensification of existing employment sites; and ICL wished to see mention of other research based industries as well as bio-medical research and also asked to remove the reference to affordable space.

Council's response to representations

The general support is welcomed. The proposed changes to the policy that would support replacement of employment uses with modern facilities is not considered necessary in this policy. As the policy refers to public transport accessibility as a factor to be taken into account when assessing development proposals, no amendment is required in respect of this matter. The geographic areas are identified in the policy as they align with the strategic development proposals of the Plan, indicating where large scale employment uses will primarily be supported, which is in part due to their access to public transport and existing and future amenities.

In respect of National Grid's comments, the council considers that policy E2 satisfactorily deals with the matter of underutilised sites.

Action arising from representations

- Amend policy to acknowledge support for other research based industries.
- Amend policy to allow flexibility in requiring affordable space in development schemes.
- Inclusion of the White City and Earl's Court and West Kensington Opportunity Areas as the preferred locations for new office development above 2,500m².

Borough-wide Policy E2 – Land and premises for employment uses

Organisations/Individuals that commented

Universities Superannuation Scheme Limited; Transport for London Commercial Development; National Grid Property Ltd; The Regents Network; Hammersmith & Fulham Historic Buildings Group; The Berkeley Group; Aurora Property Group Ltd.

General summary of representations

There was both objection and support for the requirement for marketing of 12 months to assist in consideration of the loss of employment uses. Some representations also questioned whether there was a conflict between policy E2 seeking to retain land and premises and policy HO1 seeking to increase housing supply, as well as a conflict between the policy and the NPPF. National Grid wanted to see further support for the redevelopment of poor quality or underused employment sites. Transport for London Commercial Development sought more flexibility within the policy to encourage a fluid change of employment uses. Two representatives queried the relationship between policy E2 and strategic site policy SFRRA1.

Council's response to representations

The council welcomes comments of support. It is considered that twelve months is an appropriate length of time to test marketing, gives an indication of 'market signals' and is a period commonly used to test marketing criteria. In respect of requests for more flexibility, the council considers that the planning objective of supporting local employment can best be achieved by controlling the loss of viable employment land to other uses. There is flexibility within the existing policy and further changes would risk losing the ability to manage land use change.

The council considers that the policy is in conformity with NPPF paragraph 22 and there is no conflict between the Local Plan policies. In respect of the relationship between policies E2 and SFRRA1, the council considers that there is no tension between the two and would point out that it is always possible for a site policy to identify site specific uses over and above generic topic policies.

Action arising from representations

None

Borough-wide Policy E3 – Provision for visitor accommodation and facilities

Organisations/Individuals that commented

Hammersmith & Fulham Disability Forum; Car Giant and London Regional

General summary of representations

There is general support for this policy. The Disability Forum suggested that applications for visitor accommodation and facilities should also be assessed against BS 8300: 2009 and that the policy should conform with the London Plan.

Council's response to representations

The council welcomes comments of support. With regard to accessibility and inclusive design, the London Plan forms part of the development plan and therefore it is unnecessary to list specific policies and supporting guidance in the justification for Policy E3. See also policy DC2 Design of new build and DC4 Alterations and extensions.

Action arising from representations

None

Borough-wide Policy E4 – Local employment, training and skills development initiatives

Organisations/Individuals that commented

The Berkeley Group; Cargiant and London and Regional; Aurora Property Group Ltd

General summary of representations

There is general support for this policy, but concern at the council policy to “insist on appropriate employment and training initiatives for local people”. It is recommended that “insist”, is replaced by “seek” or “encourage”. Also there are concerns with the policy to encourage businesses to adopt the London Living Wage.

Council’s response to representations

The council considers it appropriate that employment and training initiatives are provided in major developments. However, it is agreed that “to require” would be more appropriate than “to insist” in this context. In respect of the London Living Wage, it should be noted that this is not a requirement, rather the policy encourages such a wage.

Action arising from representations

- Amend policy to remove the phrase “will insist on” and replace with ‘require the provision of’

Town and Local Centres

Organisations/Individuals that commented

Ms Pauline Fowler

General summary of representations

The respondent suggested that there would be benefits from a vision which allows and encourages diversity of use within conservation and residential areas. Also, that Council should preserve diversity of use where it already exists, rather than allowing takeover by residential use.

Council's response to representations

The council notes that the proposed retail hierarchy in the draft local plan identifies specific locations which are earmarked for commercial uses. The proposed policies make it clear that residential use would be resisted at ground floor level within the identified centres in favour of commercial uses.

In addition, the proposed policies seek to protect retail uses outside of the designated centres and change of use would only be permitted subject to certain criteria being met. This protection extends to corner shops and more isolated retail uses that serve a local need.

Action arising from representations

None

Borough-wide Policy TLC1 – Hierarchy of Town and Local Centres

Organisations/Individuals that commented

Westfield Shoppingtowns Ltd; Marks & Spencer Plc; WM Morrisons Supermarkets PLC; MP Kings Retail Sarl; MP Kings Retail Sarl; Hammersmith Society; Land Securities; Capital and Counties on Behalf of Earls Court and Olympia Group; MP Kings Retail Sarl; Liberal Democrats; Cargiant and London and Regional; English Heritage-London Region.

General summary of representations

There is general support for this policy and Westfield Shoppingtowns Ltd particularly supports the potential to consider the area north of Westfield and a northwards extension of the town centre.

One respondent was of the opinion that the 2,500 sq. m impact assessment threshold set out in the NPPF should be reduced to 1,000 sq. m to reflect recent changes in consumer shopping habits and the changing face of convenience goods retailing. In addition, several respondents raised concerns that the evidence base used appears to be out dated (i.e. the West London Retail Needs Study (WLRNS) 2010).

Several respondents supported the recognition of Hammersmith as a major centre in the London Plan and that sites should be developed within the Town Centre to strengthen that role and regenerate King Street. However, there were recommendations that the retail hierarchy should be reviewed, and if appropriate, additional local centres, neighbourhood parades or satellite parades should be

added to the hierarchy. Also, that Policy TLC1 should recognise the important role that Strategic Sites will play in encouraging the regeneration of King Street.

There were several comments regarding vacant premises. One of the respondents requested that Council take measures to facilitate vacant retail premises being brought back into use. This includes compiling a register of empty shops and contact details of landlords and commercial agents. Another respondent believed that some consideration should be given to how redundant shops and pubs can be used for an expanded definition of "community facilities and services." Multi-purpose facilities that can be used by local charities or community groups for offices, meetings, and events can bring life to a high street and help build communities.

One of the respondents considered that the reference in Policy TLC1 which seeks to restrict new shopping facilities in major regeneration areas to provide for 'day to day' needs is considered unduly and unnecessarily restrictive. Another respondent noted that there is currently no definition of 'day to day' needs.

English Heritage-London Region requested that the Townscape Character background report be referred to within this policy and that it is recognised that Hammersmith and Fulham are both archaeologically significant town centres.

Cargiant and London and Regional made specific comments in relation to the retail hierarchy for the Old Oak Common Regeneration Area.

Council's response to representations

The council welcome the support and comments made regarding this policy. The council agrees that restricting new shopping facilities in major regeneration areas for 'day to day' needs is restrictive and not appropriate in Policy TLC1. The council also agree that further reference could be made to regeneration in Policy TLC1. In respect of the retail hierarchy this will be reviewed through the Local Plan process, if and when a new centre is established which warrants inclusion. At this stage, the council considers that there should be no additions or deletions to the existing hierarchy. However, some changes should be made to existing centres, including the extension of the Shepherds Bush town centre boundary.

The council has commissioned an update to the 2010 retail needs study. The new updated study 'Retail Needs Study 2016' will be published alongside the Proposed Submission local Plan. With regard to the floorspace threshold for retail impact assessments, the council has sought advice on an appropriate local threshold as part of the Retail Needs Study update and consequently the Local Plan is to be amended with a proposed 300 sqm threshold.

The council welcome and acknowledge the specific comments with regard to vacant shops. The retail policies in the Local Plan have been amended to encourage a greater mix of uses within designated centres and to reflect changes to permitted development rights.

In response to the comments made by English Heritage-London Region, the council notes that reference to the townscape character background report will be considered where appropriate and that the proposals map which will accompany the Local Plan, will show the archaeological priority areas that are located within the centres. Reference to them in this policy is not considered necessary.

With regard to the Old Oak Common Regeneration Area the comments are noted, but as of April 1st 2015 planning responsibility for the Old Oak Common Area has

been taken over by a Mayoral Development Corporation. The Old Oak Regeneration Policies will therefore be removed from the draft Local Plan. All comments related to Old Oak Common have been passed to the Old Oak and Park Royal Development Corporation.

Action arising from representations

- Delete the paragraph in Policy TLC1 which refers to providing for the 'day to day' needs of people living and working in the area.
- Add text to support regeneration in town centres.
- Extend the boundary of Shepherds bush town centre
- Add a new Local threshold of 300sqm for retail Impact assessments
- Publish the Retail Needs Study 2016 alongside the Proposed Submission Local Plan

Borough-wide Policy TLC2 – Managing uses in the prime retail frontage areas of town centres

Organisations/Individuals that commented

Planware; MP Kings Retail Sarl; Mr Martin Peach; Mr Anthony Williams

General summary of representations

There was general support for this policy, however several respondents requested further flexibility in relation to the type of appropriate uses outlined within Policy TLC2. One of the respondents had concerns that the policy is considered to be ambiguous and left down to the Councils discretion as to what constitutes over proliferation. Also, it was noted that changes to permitted development rights have necessitated amendments to the policy wording.

One of the respondents noted that the policy takes no account of the positive impact a proposal may have and that it does not allow exceptions. In addition, no consideration has been given to the potential negative impact that the policy may have on the local community, employment provision or to sustainability.

Concerns were raised that that the proposed policy was inconsistent with the National Planning Policy Framework (NPPF) for the following reasons:

- The Framework cannot be interpreted to allow over-generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions;
- The policy potentially stifles economic development;
- No mention of the sequential test which sets out the criteria by which the merits of the location of an A5 use are to be judged. The proposed policy could potentially restrict A5 uses which would comply with the sequential test, and therefore it will operate in conflict with the Framework.

Another respondent requested that there is an additional policy to deal with money lending offices which appear to have an A1 shopfront but the business is primarily pay-day loans.

Council's response to representations

The council welcome the support and responses and consider that policy TLC2 is based on sound background evidence and that it offers flexibility in relation to the type of appropriate uses as well as supporting the retail core of the centres. Council notes that changes to permitted development rights have necessitated amendments to the policy wording.

In regards to the NPPF, the council makes the following comments:

- the council considers that the policy is in accordance with the NPPF which is concerned with ensuring the vitality of town centres.
- some non retail uses are considered complementary to the town centre, but it is considered good practice to manage the extent of such uses in the prime retail frontages, otherwise the retail function could be adversely affected.

In regards to lending offices, the council makes the comment that our planning enforcement team would need to establish if a breach of the lawful use had occurred. It would be difficult to draft a Local Plan Policy to address this issue as policies would be led by the lawful use of the premises as determined by the use classes order.

Action arising from representations

- Amend quota criteria to provide more flexibility in the mix of uses permitted in town centre retail frontages.
- Introduce assessment criteria which consider the positive impacts of a proposed use.

Borough-wide Policy TLC3 – Managing uses in non prime frontage areas of town centres

No responses were received for this policy

Borough-wide Policy TLC4 – Managing uses in key local centres, neighbourhood parades and satellite parades

Organisations/Individuals that commented

Campaign for Real Ale; Planware; Hammersmith Society; Kentucky Fried Chicken (Great Britain) Limited; Mr Martin Peach

General summary of representations

There was a general objection to this policy. One of the respondents made the observation that there are two references to proposals involving the loss of pubs and these should both refer to Policy TLC8 and in particular the tests that are required under that policy.

There were concerns that that the proposed policy is inconsistent with the National Planning Policy Framework (NPPF) for the following reasons:

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- Restricting the location of hot food takeaways would be unsound and the Framework provides no justification for using the development control system to seek to influence people's dietary choices.
- The policy could significantly restrict the location of all new A5 proposals within the borough, and is not a positive approach to planning.
- The policy takes an ambiguous view of A5 uses in relation to the proximity to existing schools, parks and youth facilities. It applies an over-generic approach to restrict development with little sound planning reasoning or planning justification.
- The proposed policy does not allow for exceptions.
- No consideration has been given to the potential negative impact that the policy may have on the local community, employment provision or to sustainability. No alternative considerations to this generic approach have been presented.

One of the respondents requested that the term 'community asset value' be replaced with 'assets of community value'. In addition, one of the local residents requested a policy on the loss of pubs outside of retail centres.

Council's response to representations

The council agree with the observation regarding the reference to loss of pubs and have removed the text which duplicates policy TLC8.

In regards to the comments about the NPPF, the council notes that the proposed quota policies in the draft Local Plan had not changed significantly from those in the existing Development Management Local Plan which was adopted in July 2013 and thus post-dates the NPPF. These policies, including the consideration of the proximity of schools in relation to takeaways, were found sound by an inspector in 2013 on the basis of evidence and advice from local health practitioners and organisations.

The wording in Policy TLC4 does not preclude takeaway use within the local centres and there are no distance criteria or exclusion zones proposed in this policy, it merely states that the proximity of locations where children congregate will be taken into account. This allows proposals to be considered on their merits on a case by case basis with no blanket restriction on the location of takeaway use. Further supplementary detail will be provided in the Planning Guidance SPD on this topic. It is considered that the wording regarding hot food takeaways is unnecessarily duplicated in several retail policies and it will therefore be removed from this policy and detailed in a separate policy.

Action arising from representations

- Agree that the text relating to 'community asset value' should say 'Assets of Community Value'. Notwithstanding this the text has been removed from the policy because it duplicates the wording in policy TLC8 on Pubs.
- Remove quota criteria for A3-5 uses to reflect changes to permitted development rights and provide more flexibility in the mix of uses within the local centres.

Borough-wide Policy TLC5 – Small non designated parades, clusters and corner shops

Organisations/Individuals that commented

Planware; Kentucky Fried Chicken (Great Britain) Limited; Mr Anthony Williams

General summary of representations

There was one supportive response received, whereas the other two were of the opinion that in principle, this policy is inconsistent with the National Planning Policy Framework for the following reasons:

- The Framework provides no justification for using the development control system to seek to influence people's dietary choices, nor is there any adequate evidence to justify the underlying assumption of the policy that locating any A5 use within certain distances of schools, parks and youth facilities causes adverse health consequences which would in turn have negative land use planning consequences.
- The policy will restrict new take-away (A5) proposals within the borough, thus is not a positive approach to planning. No consideration has been given to other A1 class uses and their contribution or impact on daily diet or wellbeing; therefore the sale of food and drink will still occur.
- The policy does not allow for exceptions.
- The policy takes an ambiguous view of hot food takeaways in relation to the proximity of parks, youth facilities and schools and applies a blanket approach to restrict development with little sound planning reasoning or planning justification.
- No consideration has been given to the potential negative impact that the policy may have on the local community, employment provision or to sustainability
- There is no mention of the sequential test in the policy which sets out the criteria by which the merits of the location of an A5 use are to be judged. Proximity to schools is not relevant to the sequential test.

Council's response to representations

The council welcome the support and responses, and notes that whilst the proposed quota policies in the draft Local Plan had not changed significantly from those that were found sound by an inspector in 2013, recent changes to permitted rights have made it necessary to make amendments to the policy. The specific quota criteria have therefore been removed to provide greater flexibility in the mix of uses permitted. As with Policy TLC4 above, it was considered that the wording regarding hot food takeaways is unnecessarily duplicated in the retail policies and it will therefore be removed from TLC 5 and detailed in a separate policy.

Action arising from representations

- Remove quota criteria for A1 uses and non A1 uses (including A3-5 uses).
- Remove wording relating to hot food takeaways and put it in a separate policy

- Remove wording relating to Public houses as this duplicates wording in Policy TLC8 ‘

Borough-wide Policy TLC6 – Managing the impact of food, drink and entertainment uses

Organisations/Individuals that commented

Planware; Mr Anthony Williams

General summary of representations

One of the local Residents is supportive of the approach of this Policy but recommends that cinemas should not be treated in the same way as other entertainment venues.

One of the respondents considered that the policy should be deleted along with the supporting text for the following reasons:

- The Framework cannot be interpreted to allow over-generic and ambiguous restrictions on a particular use class;
- The policy aims to control the opening hours of use class A3/A5 with little sound planning reasoning or planning justification. The policy is not positive in its approach;
- As worded, the policy is ambiguous, limiting the opening hours of use class A3/A5 could prove detrimental to Hammersmith and Fulham’s night time economy;
- Investment in business should not be over-burdened by the combined requirements of planning policy expectations; and
- No consideration has been given to the potential negative impact that the policy may have on the local community, employment provision or to sustainability.

Council’s response to representations

Council welcome the support and note that Cinemas and leisure uses which satisfy the criteria identified in the policy, could be considered to be exceptions.

Furthermore, Policy TLC6 is closely linked to the council’s licensing policy and is considered to be appropriate. It includes a degree of flexibility and provides exceptions to the opening hours when certain criteria are met.

Action arising from representations

None

Borough-wide Policy TLC7 – Addressing the concentration and clustering of betting shops, pawnbrokers and payday loan shops

Organisations/Individuals that commented

MP Kings Retail Sarl; Hammersmith Society; Land Securities; Mr Martin Peach; Liberal Democrats

General summary of representations

There is general support for the approach in the policy, and the increased control placed on the location of betting shops, pawnbrokers and payday loan shops to ensure clustering does not continue. There was a request from a respondent that reference to the impact on health and finances be deleted as it is not considered to be a planning reason.

Council's response to representations

The support is welcomed. With regard to the proposed wording change, the council notes that the wording is included to provide additional detail on the impact of betting shops and similar uses. However, when considering applications, it will be their land use impact which will be considered and therefore recommend that the wording stays the same.

Action arising from representations

- Add policy text on takeaways which was previously duplicated in several retail policies.

Borough-wide Policy TLC8 – Public Houses

Organisations/Individuals that commented

Campaign for Real Ale; Greater London Authority; Hammersmith Society; Mr Anthony Williams; Mr Martin Peach; English Heritage-London Region

General summary of representations

There is general support for the policy and that public houses are important and necessary community facilities. Greater London Authority supports the policy and its consistency with Policy 4.8 of the Further Alterations to the London Plan.

One of the respondents suggested that the wording of this policy should make it clear that when a property is advertised for sale or leased as a pub, that the rent or value is a fair reflection of the going rate and not artificially inflated. Another respondent requested minor wording changes to the Policy to reflect that the council will encourage residents to add public houses to the Community Assets Register and will keep a register of the 109 traditional pubs in the borough.

Council's response to representations

The support is welcomed. In regard to advertisement and rent prices, council will review the policy to see if it can be strengthened in this regard, and whether this is best placed in the policy or whether a supplementary policy or guidance note may be a more appropriate location.

In regards to the Register of Assets of Community Value, this is maintained by the council, but it is the community that nominates buildings to be on the register.

Action arising from representations

- Policy TLC8 will be amended to replace 'Community Assets Register' with 'Register of Assets of Community Value'.

Community Facilities, Leisure and Recreation

Borough-wide Policy CF1 – Supporting community facilities and services

Organisations/Individuals that commented

Tri-Borough Public Health; Canal & River Trust; Hammersmith and Fulham Clinical Commissioning Group (CCG); Catalyst Housing Ltd; Catalyst Housing Ltd; Anabela Hardwick; Hammersmith Society; Liberal Democrats; Imperial College London; H&F Disability Forum; NHS Property Services Ltd. (NHS PS); Cargiant and London and Regional; Capital and Counties on Behalf of Earls Court and Olympia Group.

General summary of representations

There was general support for this policy, for example working with strategic partners and improving school and health provision. Some respondents suggested specific amendments, for example referring to the need for open space for schools and further encouragement of active travel and recreation. There were also suggestions for fine tuning the policy.

Council's response to representations

The support is welcomed. In addition, the council welcomes representations that identified where further clarification is required. All comments on issues, topics and areas within the OPDC have been forwarded to the relevant authority.

Action arising from representations

- Where necessary, policies and supporting text have been reviewed to reflect up to date strategies of the council and strategic partners.

Borough-wide Policy CF2 – Enhancement of community uses

Organisations/Individuals that commented

Capital and Counties on Behalf of Earls Court and Olympia Group; H&F Disability Forum; NHS Property Services Ltd. (NHS PS);

General summary of representations

There was general support for the overall approach of the policy. However, concern was raised at the requirement for 12 months marketing as part of the criteria to assess viability of facilities. A comment was made that “restrictive policies, especially those which seek to require substantial periods of marketing, could delay required investment in alternative facilities and work against the Council's aim of providing essential services for the community”.

Council's response to representations

The council considers that seeking 12 months marketing information is an appropriate length of time to test marketing, it gives an indication of ‘market signals’ and is a period commonly used to test marketing criteria .

Action arising from representations

- Fine tuning of the policy.

Borough-wide Policy CF3 – Enhancement of arts, culture, entertainment, leisure, recreation and sport uses

Organisations/Individuals that commented

Capital and Counties on Behalf of Earls Court and Olympia Group; Ms Sheila Hancock; Mr Anthony Williams; The Theatres Trust; H&F Disability Forum

General summary of representations

There was general support for the policy, but concern raised about the 12 month marketing requirement as part of the criteria to assess viability of facilities. The point was also made that “viability” needs to be considered cautiously when considering community and cultural uses. One of the representors suggested that changes in nearby uses should be assessed against their proximity to a theatre or similar use, to prevent unreasonable restrictions on the future noise / amenity environments around servicing areas and other entrances and places of public activity as associated with the original uses.

Council's response to representations

In respect of comments about marketing requirements, please see response to representations on policy CF2.

The council accepts that the term ‘viable’ should be used with caution in the determination of planning applications in relation to community and cultural uses that may be subsidised. It considers that the policy, when applied as a whole, will allow for proper consideration of such matters. With regard to noise sensitivity and compatibility issues with new residential uses adjacent to existing businesses, the council considers that policy CC10 on noise (see point 3) adequately addresses this issue. Therefore, no amendment is considered necessary to Policy CF3.

Action arising from representations

- Amend policy so as to ensure new and expanded venues are accessible and inclusive.

3.4 Borough-wide Policy CF4 – Professional football grounds

Organisations/Individuals that commented

Chelsea Football Club; Fordstam Ltd; Mr Nicolas Crosthwaite; H&F Disability Forum

General summary of representations

Two representations were particularly in favour of the policy approach to protect the continuation of professional football within the borough. There was however concerns that any redevelopment should not impact detrimentally on neighbours or on the environment, particularly on biodiversity. In addition, the Disability Forum sought to ensure that facilities were accessible and inclusive.

Council's response to representations

Support welcome. In respect of impact on amenity and the environment, the council considers that other policies within the Local Plan will ensure that these matters are considered satisfactorily. Similarly, any new developments would need to be built so as to be accessible and inclusive.

Action arising from representations

None

Green and Public Open Space

Borough-wide Policy OS1 – Protecting parks and open spaces

Organisations/Individuals that commented

Jonathan Williams; Groundwork London; Hammersmith Society; Hammersmith & Fulham Historic Buildings Group; Mr Anthony Williams; Friends of Wormwood Scrubs; Mr Nicolas Crosthwaite; H&F Disability Forum; Cargiant and London and Regional; Jane Bain

General summary of representations

There was general support for this policy and a number of representations were either related to Wormwood Scrubs or to future open space in the Old Oak Regeneration Area. The Hammersmith Society requested that 2% of CIL or s106 monies should be allocated to tree planting and the Historic Buildings Group wanted the policy to seek a “high level of maintenance throughout the Borough spaces where necessary by planning agreements”. A number of representations also suggested fine tuning of policy, including adding housing greenspace to the hierarchy.

Council's response to representations

Council welcome the support. All comments related to Wormwood Scrubs and the former Old Oak Regeneration Area have been passed to the OPDC. In respect of requests for inclusion of references to matters such as maintenance, tree planting and accessibility and inclusivity, the council notes that other policies in the Local Plan adequately cover these areas. Policy OS2 requires new open spaces to be accessible and inclusive; policy OS5 refers to tree planting and chapter 9 of the Local Plan is concerned with CIL and Section 106 Agreements (see also the CIL Charging Schedule). In respect of suggestions to add housing greenspace to the hierarchy, the council considers that policy OS2 provides sufficient policy guidance for this type of open space.

Where necessary, updating of supporting paragraphs has taken place.

Action arising from representations

- Minor amendments and updating of supporting text, for example to reflect establishment of the OPDC.

Borough-wide Policy OS2 – Access to parks and open spaces

Organisations/Individuals that commented

Tri-Borough Public Health; Hammersmith Society; National Grid Property Ltd; Hammersmith & Fulham Historic Buildings Group; Mr Martin Peach; Liberal Democrats; Friends of Wormwood Scrubs; Mr Nicolas Crosthwaite; H&F Disability Forum

General summary of representations

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Representations mentioned the many benefits of open space, including links to improved health and reduced child obesity. There was a call from some representatives for a presumption against development on open space. One representor believed that “taller buildings in a development should be allowed if more open space can be provided”. Detailed comments included support for use of S106 funding to improve open space and requiring replacement open space nearby rather than elsewhere in the Borough.

National Grid Property noted that the level of public open space to be provided will be dependent on a number of key factors including the scale of residential development, the location and quality of the public open space and the viability of the scheme at the application stage. Therefore, they considered it inappropriate and premature for quantitative public open space requirements to be set through the Local Plan.

Council's response to representations

The general support for the policy is welcomed. All comments related to Wormwood Scrubs and the former Old Oak Regeneration Area have been passed to the OPDC. The calls for a presumption against development are understood, but the council considers that a certain amount of flexibility is required within the policy.

In respect of comments by National Grid Property, the council has agreed to amend the policy for strategic site SFRRA 1.

Action arising from representations

- Amend policy SFRRA 1 so that it no longer refers to provision of a minimum area of open space.

Borough-wide Policy OS3 – Playspace for children and young people

Organisations/Individuals that commented

Tri-Borough Public Health; Hammersmith & Fulham Historic Buildings Group; H&F Disability Forum.

General summary of representations

There was general support for this policy, although this was often subject to requests for minor amendments. One representation wished to see a policy which aimed to achieve a net gain in play space rather than no loss; there was a query how refurbishments would be funded; and a request that “safe” be added to the criteria for new play spaces. The Historic Buildings Group also suggested that the Local Plan identified distances that open spaces should be located from home for different age groups.

Council's response to representations

The policy seeks to protect existing play spaces as well as require new play spaces in development schemes and therefore overall there should be a net increase in play space. In respect of funding, the council has a maintenance and refurbishment budget, but there will be occasions when planning agreements may be appropriate.

The Council considered that including appropriate distances between play spaces and homes was not necessary.

Action arising from representations

- Policy has been amended to ensure that new play space also meets criteria for safety and security.
- General updating

Borough-wide Policy OS4 – Nature Conservation

Organisations/Individuals that commented

Environment Agency; Canal & River Trust; Hammersmith & Fulham Historic Buildings Group; Mr Anthony Williams; Mr Martin Peach; Imperial College London; Mr Nicolas Crosthwaite; Jane Bain (HAMRA)

General summary of representations

There is considerable support for this policy and particularly including the Thames as a nature conservation area. The Canal and River Trust was concerned that biodiversity enhancements should not impact on river and canal navigation. The Environment Agency identified the benefits of protecting and enhancing biodiversity; the importance of open spaces as functional floodplain and flood storage area, as well as other benefits including amenity space, sustainable drainage and more. There was mention of the importance of promoting the natural environment in all developments and in seeking ongoing maintenance of nature conservation initiatives. A number of representations preferred the alternative option that would not permit any development on nature conservation areas and green corridors. Comments also included the importance of green corridors across the whole borough and that they should be encouraged as part of any development.

Imperial College London were specifically concerned about the nature conservation value of the Central Line railway cutting in White City.

Council's response to representations

The council welcome the support and note that the comments related to the canal have been passed to the OPDC. In respect of the Central Line railway cutting, the principle of designating railway habitats is considered to be sound; and that the quality of the habitat can always be considered as and when a development proposal impacting upon the site/area comes forward.

The council considers that the policy allows for protection, whilst permitting development where justified and mitigated. It is expected that this policy is used alongside other policies in the plan and particular issues such as use of Sustainable Drainage Systems (SuDS) is dealt with adequately. With regard to new developments, the council will seek biodiversity improvements when and where appropriate.

Action arising from representations

- Amend supporting text to highlight that navigation of the waterways should not be impeded by any biodiversity initiatives.
- At paragraph 5.162 add the following text: 'Opportunities to further strengthen the funding of green corridors will be sought.'

Borough-wide Policy OS5 – Greening the borough

Organisations/Individuals that commented

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Natural England; Groundwork London; Hammersmith Society; Hammersmith & Fulham Historic Buildings Group; Woodlands Area Residents; Mr Martin Peach; Mr Nicolas Crosthwaite

General summary of representations

There is general support for the policy and it is often accompanied with comments about the importance, for example, of green and living roofs, trees and green infrastructure. Natural England consider that the borough could benefit from enhanced green infrastructure and informed the council of guidance on the location of accessible natural green space. The Hammersmith Society identified that planting in back, side and front gardens should be encouraged. Comments were made against paving front gardens with impervious paving. A critique of the policy mentioned there is not enough quantifiable policy objectives in maintaining and enhancing the planning of street trees of traditional species.

Council's response to representations

The council welcomes the support and consider the policy to be adequate to ensure that greening the borough is dealt in an appropriate manner. The council recognises the impact planting in individual homes has upon the greening of the borough, the council is limited in its ability to directly implement this, though positive encouragement through policy is supported. The council also considers surfaces an important visual and long term feature to try to maintain. With regard to numbers of trees planted; the council does not consider it necessary to set out targets for tree planting as success should not be based on a set figure.

It should be noted that the policies within the Local Plan are supplemented by detailed guidance on biodiversity matters within the Planning Guidance SPD and that conditions are attached to planning consents to ensure that biodiversity elements are a success, for example, that newly planted trees are replaced if they die. Also with the Mayor of London's SPG on Green Infrastructure and Open Environments.

Action arising from representations

- Reference to Natural England's publication "Nature Nearby" Accessible Natural Greenspace Guidance will be referred to in the revised Planning Guidance SPD.
- Inclusion of 'b. Protecting back, front and side gardens from new development and encouraging planting in both back and front gardens' to policy;
- Add sentence 'In addition, the council will generally discourage the installation of paving and impervious surfaces in existing front gardens and will encourage their removal, unless the paving is original' to paragraph 5.165
- Add 'this policy needs to be read in conjunction with the Mayor of London's SPG on Green Infrastructure & Open Environments' to paragraph 5.166.

River Thames

Borough-wide Policy RTC1 – River Thames

Organisations/Individuals that commented

Jonathan Williams; Port of London Authority; Canal & River Trust; Natural England; The Regents Network; Hammersmith & Fulham Historic Buildings Group; Mr Martin Peach; Cargiant and London and Regional; Aurora Property Group Ltd; Jane Bain; English Heritage-London Region

General summary of representations

A variety of comments were made on these policies, including some relating solely to the canal which is now situated within the OPDC area. In respect of the river, the PLA queried whether the policy was in conformity with the London Plan because it did not promote transport of passengers and freight and the protection of existing uses. Others supported the policy but made detailed points, such as cycling should be separated from pedestrians on the Thames Path; developments should enable access to the riverside and provision of recreation; flood defence is a critical issue; the character of the river should be protected; and there should be greater acknowledgement of archaeological resources.

Council's response to representations

All comments related to the Grand Union Canal have been passed to the OPDC. In respect of other representations, the council would point out that many of the points are adequately covered in other policies, for example policy RTC2 is concerned with the matter of pedestrians and cyclists on the Thames Path. With regard to the representation from the PLA, the council disagrees that there is an issue of non-conformity with the London Plan – policy T1 clearly seeks increased use of the Thames for passenger and freight use. Also, the council considers that heritage assets are adequately covered by policy RTC 3.

Action arising from representations

- Amend policy and supporting text so that it no longer refers to the canal. Additional fine tuning of supporting text where necessary
- Re-word supporting text in paragraph 5.169 to refer to London Plan and other Local Plan policy.

5.2 Borough-wide Policy RTC2 – Access to the Thames riverside and foreshore

Organisations/Individuals that commented

Port of London Authority; Environment Agency; Hammersmith Society; The Regents Network; Mr Martin Peach; H&F Disability Forum; Ptarmigan Riverside AW LLP; Jane Bain; Hammersmith & Fulham Historic Buildings Group

General summary of representations

A number of representations were concerned about safety of pedestrians on the Thames Path because of the shared access with cyclists. The requirement for the Thames Path to be 6 metres wide was also queried. The Environment Agency wished to encourage softening and naturalising of the river bank and the PLA pointed out that the foreshore is a potentially dangerous environment and access should be safe. One representation did not want to see encroachment into the river.

Council's response to representations

The council notes that the riverside walk is a shared path for use by all users including pedestrians and cyclists. The policy does, however, state that access to cyclists should be provided subject to ensuring the safety of pedestrians or river users and that prohibition of cycling would be unworkable.

In respect of the width of the Thames Path, the council considers it important to retain the wording of at least 6 metres as this is an established policy and allows for the possibility of a path of greater than 6 metres width where appropriate. If site circumstances indicate the need for a path of less than 6 metres, this will need to be considered as an exception to the policy and justified accordingly. With regard to encroachment, the council considers that this issue is satisfactorily covered by policies RTC 3 and RTC 4 and the London Plan.

Action arising from representations

- It is agreed to make changes to supporting text regarding safety and the foreshore and naturalising the river banks.
- Add full title: 'Thames Path National Trail' to policy.

Borough-wide Policy RTC3 – Design and appearance of development within the Thames Policy Area

Organisations/Individuals that commented

The Regents Network; Hammersmith Society; Peterborough Road and Area Residents Association; Mr Martin Peach; The Berkeley Group; H&F Disability Forum; Ptarmigan Riverside AW LLP; Jane Bain; Hammersmith & Fulham Historic Buildings Group; English Heritage-London Region

General summary of representations

Notwithstanding general support, a number of the representations were concerned with the policy approach to tall buildings, particularly within the South Fulham Riverside Regeneration Area. Amenity groups did not want to see tall buildings along the riverside, whilst developers held an opposing view and wanted to see a more sympathetic approach to such development. English Heritage generally supported the policy, further consideration should be given to the Conservation Area assessments.

Council's response to representations

The council welcomes the support for the policy and considers it to be consistent with CABE guidance and that it provides a balanced approach. In response to questions about the tall buildings, the council agrees that supporting text could provide further clarification, however they consider that the general presumption against tall buildings in the Thames Policy Area will not limit the borough in meeting its housing and economic development requirements. To provide further clarity on the matter and to ensure any proposal is considered on its own merits, the requirement of a design and access statement is necessary as part of any proposal along the River Thames with further detail discussed in the supporting text on what matters the statement should address.

Action arising from representations

- Clarify approach to location of tall buildings in the supporting text
- Add: 'The council will require the submission of a design and access statement as part of a planning application within the Thames Policy Area' to policy.
- Removal of policy specific to tall buildings.
- Add reference to the conservation area assessments in paragraph 5.180.

Borough-wide Policy RTC4 – Water-based activity on the Thames

Organisations/Individuals that commented

Port of London Authority; Hammersmith Society; The Regents Network; H&F Disability Forum; Ptarmigan Riverside AW LLP; Hammersmith & Fulham Historic Buildings Group

General summary of representations

There was general support for more water based activity on the river; however varying points were made by different groups and organisations. The PLA wished to see greater emphasis for freight transport and use of safeguarded wharves, whereas others were more interested in encouraging commuter and passenger services. In respect of moorings, there was a call for policy clarification and more detail on acceptability. Ptarmigan supported mixed use of wharves.

Council's response to representations

The policy needs to be read alongside borough wide policy T1-Transportation which clearly seeks increased use of the Thames River for passenger services and freight use. In addition, this aspect of the policy is also dealt with in some detail in the London Plan. In respect of moorings, the policy does not specifically refer to these, however the supporting text states that proposals for new permanent moorings will be considered in relation to the policy criteria included in policy RTC4. Although moorings are also subject to London Plan policy 7.27, the council consider that the aforementioned sentence should be included in the policy.

Action arising from representations

- Amend policy to include statement on moorings.

Borough-wide Policy RTC5 – Enhancing the Grand Union Canal and improving access

Organisations/Individuals that commented

Port of London Authority; Canal & River Trust; The Regents Network; Hammersmith & Fulham Historic Buildings Group; H&F Disability Forum; Cargiant and London and Regional; Aurora Property Group Ltd; English Heritage-London Region

General summary of representations

Comments on policy applicable to the canal.

Council's response to representations

All comments related to the Grand Union Canal, which is no longer located within the Borough, have been passed to the OPDC which is now responsible for planning policy within this area.

Action arising from representations

Policy RTC5 has been removed from the Local Plan.

Design and Conservation

Organisations/Individuals that commented

English Heritage-London Region, Ms Pauline Fowler, Jonathan Williams

General summary of representations

English Heritage generally supported the conservation and design policies, but they gave some recommendations to ensure compliance with the NPPF.

One of the representatives suggested that we use a bolder vision for Hammersmith's historic streets, and one that can be seen, using drawn illustration, within the Local Plan. This was supported by another representative who had the view that a drawn or modelled design guidance, derived from successful studies would assist in guiding development in an attractive and easily understood direction.

There was also the view that the borough was largely developed in the C19th which gave little consideration to urban amenity and that the borough must change if it is to remain relevant and desirable. Therefore, consideration should be given to well-designed development that improves liveability, density of occupation and urban vitality, even within conservation areas. Also, that if development is restrained in parts of the borough due to conservation areas, then this may result in over-development in other areas.

Council's response to representations

The council makes the comment that the aim remains the preservation and enhancement of the Boroughs conservation areas. Each conservation area will have its own character and visual qualities. It is not the purpose of the Local Plan to develop individual enhancement proposals. Furthermore, Conservation Area Character Profiles, Supplementary Planning Documents and Planning Framework Documents include drawings and computer generated images to support a vision or illustrate points made in the text.

In regards to location of future development, the Borough has four regeneration areas where development will be encouraged. It is anticipated that development in these relatively large areas will provide new high quality architecture and create a sense of place within sustainable developments. The policies in conservation areas would not preclude sympathetic redevelopment of sites providing that the development meets the NPPF and Local Plan criteria in every respect. Conservation Areas have always been subject to redevelopment proposals and are likely to remain so.

The council does not expect that the Boroughs conservation areas would experience large scale "modernisation". The NPPF requires conservation areas "to be conserved in a manner appropriate to their significance". In addition, the NPPF states that planning policies should not attempt to impose architectural styles or particular tastes and avoid unnecessary prescription or detail.

Action arising from representations

None

Borough-wide Policy DC1 – Built Environment

Organisations/Individuals that commented

Tri-Borough Public Health, Marks & Spencer Plc, Hammersmith Society, National Grid Property Ltd, Hammersmith & Fulham Historic Buildings Group, Capital and Counties on Behalf of Earls Court and Olympia Group, , Mr Martin Peach, Mr Nicolas Crosthwaite, H&F Disability Forum, Ptarmigan Riverside AW LLP, Carigant and London and Regional; English Heritage (London Region)

General summary of representations

There is general support for this policy and its approach to high quality design and respecting and enhancing the heritage assets in the Borough. Some of the support was conditional with suggested minor wording changes to strengthen the policy. All the representatives objected to the alternative options.

One of the representatives appreciated the need to ‘de-clutter’ pedestrian routes, however raised concerns for the less mobile residents that use street furniture to sit in pleasant, social areas while outside. Another respondent raised concerns that some conservation areas still do not have Conservation Area Profiles and requested that a schedule to be agreed for drawing up the remaining CAPs as a matter of urgency.

There was some concern raised about tall buildings and that the policy seems to have a presumption towards tall buildings in the borough and includes some subjective phrases which would be difficult to quantify. There was general agreement that tall buildings must be of the highest standard of design and be a successful urban design concept and that their impact on low rise residential areas must be thoroughly examined. One respondent specifically stated that they do not want tall buildings on the South Fulham riverside. There was also a suggested wording change for any proposals for tall buildings to respect views from the river.

Other respondents felt that it is important that the policy is not unduly prescriptive or risks restraining potential design solutions which would be more appropriately explored through the development management process. There were concerns that the approach to tall buildings and high density development in this policy is overly and unnecessarily negative. There were suggestions that the policies need to more clearly recognise that parts of the borough have been identified as suitable for tall buildings and should take a more balanced view on the potential impact of tall buildings on the historic environment.

National Grid Property Ltd and Hammersmith & Fulham Historic Buildings Group supported the policy’s approach to high quality design, however noted that the policy must be consistent with the heritage policies in the NPPF, in relation to the weight to be applied to protecting different heritage assets and the historic environment. There were concerns that the Borough’s ‘Local Register of Buildings of Merit, has not been updated since its original adoption and that if buildings are not on this list, their significance is in danger of being undervalued in planning decisions.

Several of the respondents also acknowledged that ‘Streetsmart’ is a valued guidance document but raised concerns that its guidance related to the historic environment has often not been followed. There was also an enquiry about when it is likely to be reviewed.

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Hammersmith & Fulham Historic Buildings Group raised concerns with Map AM9: Hammersmith Regeneration Area (HRA) and that the area north of the A4 in the section over the road from Furnivall Gardens is included in the regeneration area. Development here could seriously affect the setting of Furnival Gardens and the river. We need to be assured that any development here is within conservation principles.

With regard to the Old Oak Common Regeneration Area the comments are noted, but as of April 1st 2015 planning responsibility for the Old Oak Common Area has been taken over by a Mayoral Development Corporation. The Old Oak Regeneration Policies will therefore be removed from the draft Local Plan. All comments related to Old Oak Common have been passed to the Old Oak and Park Royal Development Corporation.

Council's response to representations

The council welcome the support. The council's aim is for a coherent placing and composition of tall buildings across the Borough. The council's Tall Buildings Background Paper included a desk based spatial analysis of the borough to map those areas that would be inappropriate for tall buildings and those areas that may be suitable. It took account of areas which would be particularly sensitive to tall buildings such as conservation areas, settings of listed buildings and open spaces, the riverside and residential areas of consistent scale height and grain. It also acknowledged that tall buildings will only be appropriate if they are supported by an appropriate level of transport capacity to ensure good public transport access. Following the Background Paper extensive visual studies were undertaken in the regeneration areas to determine likely impacts and direct tall buildings to more suitable parts of the area.

In regards to street furniture, the council notes that "Streetsmart" remains the key guidance for street design in the Borough. Part of its approach was to de-clutter streets of superfluous street furniture (e.g. signage) and that furniture such as seats, litter bins etc are rarely found to be an issue in this respect. The council has plans to review and update the guidance in 2015.

In respect of comments on tall buildings, the council has removed the text within policy DC1 relating to this matter. Instead tall buildings are dealt with primarily by policy DC3-Tall Buildings. Consultation comments on this topic have been taken into account and incorporated into policy DC3 where appropriate.

The wording of the policy acknowledged that Hammersmith Town Centre both includes, and is surrounded by, heritage assets including open views from the riverside. The council accepts that the Borough has a townscape which is typical of Inner London where areas identified for regeneration will lie close to and in some case overlap with designated heritage assets. Without detailed visual and townscape analysis it would be wrong to claim that all of an area is capable of accommodating tall without detrimentally affecting the setting of a local heritage asset. Therefore, any proposal for a tall building would need to be carefully assessed in this context.

However, the council agrees with the suggested change to the text to make reference to views from the river. The council agrees that the Boroughs riverside is particularly sensitive to tall buildings. The massing study carried out as part of the planning framework for the area identified limited locations where tall buildings could justifiably make a positive contribution to the area. The study concluded that a limited amount of carefully located tall buildings would be appropriate. The majority

of the policy text on tall buildings, particularly relating to appropriate locations is now contained within the justification text for policy DC3 on Tall Buildings.

The council would point out that work has been progressing on the analysis for the eleven conservation areas that do not benefit from a Conservation Area Character Profile. The initial analysis for all eleven areas is almost complete.

In regards to South Fulham riverside, the council notes that the South Fulham Riverside SPD included a massing study which promoted a more consistent built frontage to the riverside to provide edge definition to the riverside. It is clear that within these parameters there will be areas where the heights would decrease and limited areas where the height could increase in order to get some variation in an otherwise relatively consistent parapet height.

In regards to the concerns with the proposal maps, the council notes that the area has been included to form a logical boundary to the town centre and include an area which would provide the setting for the A4 corridor. Any development in the town centre would be subject to policies pertaining to the town centre designation as well as heritage considerations.

Action arising from representations

- Amend second sentence of policy DC1 from 'considers' to 'demonstrates'
- The council will amend the supporting text as appropriate
- Amend first paragraph of Policy DC1 to include heritage assets.
- Remove text on tall buildings and appropriate locations from policy DC1 into Policy DC3 as this matter now covered primarily by policy DC3- Tall Buildings.
- Proposed amendments in relation to tall buildings will be incorporated into policy DC3 where appropriate.

Borough-wide Policy DC2 – Design of new build

Organisations/Individuals that commented

Hammersmith Society, National Grid Property Ltd, Hammersmith & Fulham Historic Buildings Group, Liberal Democrats, Mr Martin Peach, Mr Nicolas Crosthwaite, The Berkeley Group, H&F Disability Forum, Group, English Heritage-London Region.

General summary of representations

There is general support for this policy as it aims to ensure new build development will be of a high standard of design, however respondents felt that some additional words needed to be included in the glossary and some amendments to the wording of the policy were needed.

National Grid Property Ltd support the aim of the policy but considers that where high quality design and the characteristics of a site allows it, the potential should be explored to deliver higher density developments that may exceed the scale of neighbouring developments. This would assist the Borough in meeting its increased housing targets.

Several of the comments related to the proposed design criteria. H&F Disability Forum supported the reference to the principles of accessible and inclusive design.

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Whereas another respondent considered that some of the criteria were considered unquantifiable and subjective. Another respondent requested additional wording to the criterion and supportive text to encourage the use of energy performance standards such as PassivHaus.

There were concerns that protecting conservation areas is important but the rules governing them should not prevent the adoption of sustainable building processes. Also, that the adaptation of existing buildings should always be considered – sometimes in conjunction with new build - for sustainability reasons and maintaining sense of place.

English Heritage-London Region welcomes the reference to historical context and requested some changes to the wording of the supporting text, including further reference to the council's Townscape Character Background Paper, Conservation Area Appraisals and Area Action Plans. They also raised concerns that the supporting text refers principally to urban design rather than architectural quality and recommend that the plan provides more direction on how buildings address existing streets, or how larger developments might reinstate lost street patterns.

There was some support for the alternative option 2 as Design and Access statements are considered essential. There was opposition in regards to option 1 with the opinion that high quality cannot be provided without consideration of design.

Council's response to representations

The council welcomes the support and agree with the request for permeable and legible to be added to the glossary of terms. The council also agrees with the comments regarding the criterion and have made changes where appropriate.

In regards to the comments by English Heritage-London Region, the council notes that reference to Conservation Area Character Profiles as source material are made in the supporting text. The council agree with the recommended wording change to the criterion to make reference to connections, permeability and also replace built heritage with townscape character in the supporting text.

In regards to providing higher density, the council notes that the focus of the regeneration areas will be to accommodate high quality sustainable places which are likely to exceed the traditional scale of much of the Borough. There may also be special circumstances of individual sites to exceed the prevailing scale but the general aim is for a contextual response for all developments.

It is considered that additional reference to encourage PassivHaus is more appropriate in policy CC1. It is further noted that Local Authorities are encouraged to assess the significance of the heritage asset, and any material harm caused to the asset or its setting, and whether that harm is outweighed by the sustainability benefits of any proposal.

Action arising from representations

- Add additional text to last paragraph of Policy CC1 to include reference to energy performance standards such as PassivHaus
- Amend criteria (b) and (f) to include reference to connections and good permeability.

- Amend the first line of Paragraph 7.200 to replace “built heritage” with “townscape character”
- Replace “good neighbourliness” with “residential amenity” at point (e)
- Remove criteria (j) ‘the concerns of the local community’
- Add “permeable” and “legible” to the glossary of terms

Borough-wide Policy DC3 – Tall buildings

Organisations/Individuals that commented

Royal Borough of Kensington & Chelsea, Marks & Spencer Plc, Greater London Authority, English Heritage-London Region, Hammersmith & Fulham Historic Buildings Group, Mr Martin Peach, Mr Nicolas Crosthwaite, H&F Disability Forum, Jane Bain.

General summary of representations

There is general support for this policy and supporting text, with special mention of the protection of the Strategic Linear View from King Henry’s Mount in Richmond Park to St Paul’s Cathedral. H& F Disability forum support this policy because it includes reference to the principles of accessible and inclusive design.

One of the respondents requested a policy on building heights which uses the original townscape building heights as a reference point, rather than any more recently built tall buildings. There are concerns that the heights of recent developments must not be allowed to set a precedent for acceptable building heights for future development on or close to the river.

English Heritage-London Region is pleased to see references to the joint English Heritage/Design Council Guidance on tall buildings in the document. They suggest it would be helpful to understand the extent of the background work in relation to tall building analysis.

There was suggestion that tall buildings can significantly aid housing delivery by increasing the density of residential development. As such Policy DC3 should provide sufficient flexibility to enable proposals for tall buildings to be considered on a site by site basis.

Royal Borough of Kensington & Chelsea requested that the policy considers the potential harm tall buildings may have on the setting of RBKC’s Conservation Areas, Listed Buildings and protected gardens and squares. In addition, they suggested a wording change to the policy to refer to ‘substantially’ harmful impact.

Several of the respondents made comments and recommended minor wording changes to the criteria listed in the Policy for tall buildings. It was also suggested that one of the criteria is amended from ‘acceptable impact’ to ‘no substantially harmful impact’. In addition, Marks and Spencer agree that criteria based policies are generally helpful in assessing proposals, however they consider that reference to “the highest architectural quality” risks introducing too great a degree of subjectivity into the development management process.

One respondent requested that the policy include reference to overheating in London Plan Policy 5.9.

There was general disagreement with the alternative options, with the view that a

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comprehensive local plan should provide the design criteria and specific development guidance to respond to development pressure for tall buildings. Also, consider that criteria should be tightened to be more precise and follow guidance more closely.

RBKC made specific comments in regards to the supporting Background Paper on Tall Buildings. They noted that the paper does not contain any maps, illustrations or three-dimensional townscape analyses supporting the evidence and it does not consider whether previous developments (e.g. Edward Woods Estate and Clem Atlee Estate) have been successful. RBKC also requested which local views relating to Conservation Areas within RBKC close to the Borough boundary were included in the analysis.

Please also see the consultation summary for policy DC1 (above) for further comments relating to tall buildings which have been incorporated into policy DC3 where appropriate.

Council's response to representations

Welcome the support. The council considers that it is more important to assess the architectural quality of individual tall buildings as objects that set themselves apart from context than the more usual reference to "design quality" which would include contextual elements such as scale height and massing, etc. The council has also considered the recommended wording changes and made amendments to the policy where considered appropriate.

The council would point out that its approach to tall buildings has been to spatially determine where tall buildings may be acceptable across the borough and then to identify more specific areas with the aid of view analysis within the planning framework for each area.

In response to the comments about the Background Paper on Tall Buildings, this is a spatial mapping exercise which uses a broad analysis of the borough's existing townscape and uses criteria based on EH / CABE studies to determine where tall buildings may be appropriate. More detailed visual analysis work has been undertaken as part of the planning frameworks for each area. The study does not assess which tall buildings are considered to be successful and which are not.

Issues of impact on the skyline from various viewpoints will need to be studied and Council notes that these would include views from all adjoining boroughs. There will be a series of view studies that will involve sensitive viewpoints from all adjoining boroughs that will need to be undertaken to assess impacts on surrounding heritage assets.

Action arising from representations

- Amend the supporting text to refer to the 'character' of the Borough's townscape.
- Amend criteria (a) from 'acceptable' to a 'positive' relationship.
- Amend criteria (b) as follows: *"is of the highest quality of architectural design and materials quality with an appropriate scale form and silhouette which contributes positively to the built heritage and image of the borough"*
- Amend criteria (c) from 'acceptable' to 'no harmful' impact
- Amend criteria (h) of Policy DC3 to include reference to the risk of overheating through passive design measures.
- Delete the word 'generally' from Policy DC3

- Include detail on tall buildings and appropriate locations, formerly included in policy DC1.

Borough-wide Policy DC4 – Alterations and extensions (including outbuildings)

Organisations/Individuals that commented

Hammersmith Society, Hammersmith & Fulham Historic Buildings Group, Ms Pauline Fowler, Mr Martin Peach, Mr Nicolas Crosthwaite, H&F Disability Forum, Jane Bain, English Heritage-London Region

General summary of representations

General support for this policy and in principle extensions should follow the design and material of the original but this should not preclude a contrasting design at the rear of properties, especially at ground floor level. H&F Disability Forum support this policy as it refers to the principles of accessible and inclusive design.

One of the respondents encouraged the concept of mansard constructions whereas another respondent raised concerns with basement extensions due to construction effects and potential flood risk.

There was a request to remove the wording ‘in most cases’ within Policy DC4 as it is likely to be only very exceptionally that extensions could be acceptable that are not subservient to the main building.

There were a number of concerns with the supporting text in relation to hard standings in front gardens. One respondent requested additional text that if hard-standing is unavoidable it is to be SUDs permeable and accompanied by as much soft planting as possible. Another respondent requested that it is strengthened by changing the wording from ‘will not be encouraged’ to ‘discouraged’.

One respondent disagreed with the first alternative option as prohibition of extensions is unrealistic but all extensions must accord strictly to the Local Plan and other policies. They also made the comment that removal of constraints has already been rejected by Parliament in the recent permitted development legislation changes.

Council’s response to representations

The support is welcomed. The council has considered the suggested wording changes and made changes as considered appropriate.

In respect of comments on hard standings, the council has deleted text on this matter from this policy. Instead, this issue is dealt with in policy OS5 Greening the Borough.

Action arising from representations

- Delete the words “in most cases” from the second sentence of Policy DC4.

Borough-wide Policy DC5 – Shopfronts

Organisations/Individuals that commented

Hammersmith Society, Hammersmith & Fulham Historic Buildings Group, Mr Anthony Williams, H&F Disability Forum

General summary of representations

There was general support for this policy. Hammersmith & Fulham Historic Buildings Group makes the observation that shops are quite often in a parade or terrace with matching shopfronts when built. They suggest that it should be the aim to have a uniformity throughout such a parade with fascias, pilasters, stall risers and blinds and note that there is scope for individuality within these constraints. H&F Disability Forum support this policy because it makes reference to the principles of accessible and inclusive design.

Hammersmith Society raised concerns with the impact of signs on the streetscape and amenity and recommended a new paragraph be included that advertising, signage and fascias should not be over-large, and should be in style with the type of shop and the surrounding area.

One respondent made the observation that the alternative option does not conflict with stated policy DC5 but is not adequate as stand alone

Council's response to representations

The support is welcomed. In regards to the comment by Hammersmith & Fulham Historic Buildings Group, council notes that the Shopfront Guidance in the Planning Guidance Supplementary Planning Document addresses this issue.

Action arising from representations

- Insert an additional paragraph into DC5 to read: *"Fascia signs and projecting signs should not be overlarge and should be designed to be appropriate to the style of the shopfront. [See section on Shopfront Guidance in the Planning Guidance Supplementary Planning Document]"*

Borough-wide Policy DC6 – Replacement windows

Organisations/Individuals that commented

Hammersmith & Fulham Historic Buildings Group

General summary of representations

Hammersmith & Fulham Historic Buildings Group are in agreement with this Policy and disagree with the alternative option to permit replacement windows of different materials.

Council's response to representations

The council welcome the Support.

Action arising from representations

None

Borough-wide Policy DC7 – Views and landmarks

Organisations/Individuals that commented

Hammersmith & Fulham Historic Buildings Group, Ptarmigan Riverside AW LLP, Jane Bain, English Heritage-London Region

General summary of representations

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There was general support for this policy and the Hammersmith Mall Residents' Association fully support the provisions of Policy DC7 to protect the many local views which are important in determining the character of this stretch of the riverside. It is of particular concern to HAMRA that development should not be permitted which causes demonstrable harm to views from and to Hammersmith Bridge; or to views of Upper and Lower Mall.

Ptarmigan Riverside AW LLP broadly support the approach set out within Policy DC7, however do not agree with the reference to 'commercial wharves' as they do not consider that commercial wharves make a positive contribution to the river and townscape. Therefore suggest an amended wording to read: "From Wandsworth Bridge, the view up and down stream of the river."

Hammersmith & Fulham Historic Buildings Group disagree with the alternative option with a focus on the most important views or just river views. They also believe there are some important views and landmarks.

English Heritage-London Region make the comment that the policy will be effective only if it is applied to the general run of planning proposals that cause less than substantial harm to heritage assets. Therefore, recommend that both of the references to 'substantial' are omitted. In addition, recommend that 'demonstrable' harm is changed to 'harm' as demonstrable has no definition within the NPPF. They also note that NPPF promotes a positive strategy for the historic environment and therefore suggest that the policy refers to pursuing opportunities for enhancement of strategic and local views. English Heritage-London Region also note that the policy is fairly limited in scope and recommend that consideration is given to broadening it to ensure that it can be more generally applied to views identified outside the Thames policy area and strategic views.

Council's response to representations

The support is welcomed. The council notes that the Local Plan will be adopted with an associated proposals map, however this map was not produced for consultation on the Local Plan. The protected views will appear on the new proposals map and are present on the existing 2011 map.

In regards to the comments about commercial wharfs, the council notes that this part of the riverside lies within the Sands End Conservation Area. The commercial wharves and buildings are important features in the historic development of the conservation area. It is considered that the views afforded from the bridge of this part of the riverside are important and should be given due consideration. It is therefore considered that development that would cause demonstrable harm to these views will not be permitted.

Action arising from representations

- Add the following sentence to the end of the second paragraph in policy DC7: *"Opportunities for enhancement of strategic and local views will be pursued where they arise".*
- Amend fourth sentence in Policy DC7 to read: *"The Council will refuse consent where proposed development in these views would lead to substantial harm to the significance of a designated heritage asset and townscape generally, unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm caused".*

- Amend paragraph 7.227 to read: *“The council has identified key views and landmarks on the Proposals Map and in both the character profiles for the Conservation Area and in the SPDs for the individual regeneration areas. The views identified make a strong contribution to the character of the townscape in any specific location.....”*

Borough-wide Policy DC8 – Heritage and conservation

Organisations/Individuals that commented

Marks & Spencer Plc, Hammersmith Society, National Grid Property Ltd; Hammersmith & Fulham Historic Buildings Group, Mr Anthony Williams, Mr Nicolas Crosthwaite, H&F Disability Forum, Jane Bain, English Heritage-London Region.

General summary of representations

There was general support for this policy and its aim to protect, restore or enhance the quality, character, appearance and setting of the borough’s conservation areas and its historic environment. There were also some recommended wording changes to strengthen the protection for heritage buildings and Buildings of Merit. H&F Disability Forum support this policy because it includes reference to the principles of accessible and inclusive design and suggested reference be made to the Easy Access to Historic Buildings (2012) and London Plan SPG World Heritage Sites (2012) guides.

One of the respondents recommended that some of the wording in the policy should be deleted which refers to the ‘more significant the designated heritage asset’, with the opinion that all heritage assets should be treated equally.

Several of the respondents raised concerns that the proposed policy is considered to be inconsistent with the national policy. Some were of the opinion that it does not display a positive strategy for the conservation and enjoyment of the historic environment. Whereas another representative raised concerns that Heritage and Conservation is considered to be overly onerous and restrictive and also does not consider the impact of development on the significance of heritage assets.

One respondent considered that in accordance with Paragraph 137 of the NPPF, Local Planning Authorities should look for opportunities for new development within Conservation Areas, and within the setting of heritage assets to enhance or better reveal their significance. Another respondent suggested that locally listed buildings should be subject to permission to demolish.

English Heritage-London Region recommended some wording changes to this policy to align it more closely with the NPPF. They also recommended some additional principles which relate to archaeological remains and securing the future of heritage assets at risk identified on English Heritage’s national. English Heritage-London Region also made some suggested wording changes to the supporting text which state that changes of use to listed buildings often require internal or external alterations that may affect the significance of the heritage asset and further explanation is needed of the circumstances in which field evaluation and excavation are appropriate.

All the respondents generally disagreed with the alternative options provided.

Council’s response to representations

The support is welcomed. The council has considered the proposed wording changes and made changes as considered appropriate.

With regard to the possible demolition of a Building of Merit, this is only approved in exceptional circumstances. Sub policy e) is concerned with such matters and further detail is provided in paragraph 7.241

Action arising from representations

- Amend the supporting text of para 7.239 to refer to “Easy Access to Historic Buildings –Historic England, 2015
- Amend opening paragraph of policy as follows: *“The council will conserve the significance of the borough’s aim to protect, restore or enhance the quality, character, appearance and setting of the borough’s conservation areas and its historic environment, protecting, restoring and enhancing its heritage assets including listed buildings, historic parks and gardens, buildings and artefacts of local importance and interest, archaeological priority areas and the scheduled monument of Fulham Palace Moated site, unscheduled ancient monument. archaeological remains and buildings and features of local interest. The significance and potential of the archaeological priority areas will be protected and assessed, as appropriate. When determining applications for development affecting heritage assets, the council will attach great weight to conserving significance and will apply the following principles:”.*
- Replace preserve with conserve and move part (e) and move above bullet point [d].
- Remove the word “substantial” from bullet point [b] and move it to between [h] and [i].
- Add new criteria (m) and (n) to Policy DC8 as follows: (m) Expert advice will be required to address the need to evaluate and conserve archaeological remains and to advise on the appropriate mitigation measures in cases where excavation is justified. (n) Securing the future of heritage assets at risk identified on English Heritage’s national register, as part of a positive strategy for the historic environment.
- In para 7.243 replace “English Heritage” with “Greater London Archaeological Advisory Service [GLAAS]” in the supporting text
- Amend criteria (c) of Policy DC8 as follows: *“(c) Development affecting designated heritage assets, including alterations and extensions to buildings will only be permitted if the significance of the heritage asset is preserved conserved or enhanced or if there is clear and convincing justification where there is less than substantial harm, the harm is outweighed by the public benefits of the proposal. Where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered benefits in meeting climate change objectives should be balanced against any harm to the significance of the heritage asset and tailored their proposals accordingly and its setting.”*
- Amend part g (now part h) of Policy DC8 as follows: *“(h) Where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use, should be consistent with the aims of conservation of the asset’s concerned character and significance”.*

- Add the following text after the first sentence of paragraph 7.237 *“Changes of use of listed buildings often require internal and external alterations that may affect the significance of the heritage asset.”*
- Amend first sentence of point (a) in Policy DC8 as follows: (a) The presumption will be in favour of the conservation and restoration and enhancement of heritage assets, and proposals should secure the long term future of heritage assets.
- Amend paragraph 7.237 of the justification text to include an additional sentence as follows: *“Changes of use of listed buildings often require internal and external alterations that may affect the significance of the heritage asset.”*

Borough-wide Policy DC9 – Advertisements

Organisations/Individuals that commented

Wildstone Planning, Greater London Authority, Hammersmith & Fulham Historic Buildings Group, Mr Martin Peach, Jane Bain

General summary of representations

There was general support for this policy and there was suggestion from one respondent that the policy should be changed to criteria based format in order to make development control decisions less subjective. One respondent particularly supports the proposed restrictions on advertising and welcome the retention of the Mall Conservation Area’s designation as an area of special advertising control.

TfL requests that in addition to the reasons for refusal given in the draft Local Plan; that unacceptable impact on road safety, e.g. visual distraction, is added.

One of the respondents considered the policy in its current form to be unsound, as it lacks detail, is open to subjective decision making and does not go far enough to positively encourage sustainable development of large format advertising or to adequately steer decision making on advertisement applications.

The policy should relate to both the advert and its supporting structure and that whether an advert is or is not acceptable above ground floor level will need to be judged on a case by case basis. There were concerns that imposing a ban on such advertising is unduly restrictive and does not take account of individual site circumstances.

The policy should be positively worded to identify appropriate locations for large format advertising such as town centre and major arterial routes. The policy should be amended to acknowledge that advertising can assist with the viability of schemes that otherwise might not be viable.

There were several comments regarding advertisement shrouds and that this policy also needs to be addressed. The advertisement shroud policy states that shrouds will only be permitted in tightly defined circumstances but then fails to clearly or tightly define what those circumstances are. This creates uncertainty.

Hammersmith & Fulham Historic Buildings Group disagrees with the alternative option.

Council’s response to representations

The council welcome the support and note that the policy relates to all forms of advertising and does not consider it necessary to be split into sub-policies. In addition, the supporting structure is considered to be part of the design of the advertisement.

With regards to Hoardings/Digital Advertisements, the policy has been re-worded to identify when these are likely to be acceptable, in terms of their scale and impact on the surrounding area.

The Policy is consistent with the guidance laid down in the NPPF as it gives guidance on areas which are considered to be particularly sensitive to signs. It also includes wording which describes factors which will be assessed when determining applications – eg. In scale and in keeping, excessive advertising (cumulative impact), inappropriate illumination, poorly located, height above ground level.

Beyond the policy, it will be for individual proposals to be assessed in detail in relation to individual circumstances.

Action arising from representations

- Amend the second para of Policy DC9 as follows: *“Advertisements and hoardings displayed above ground floor level are normally unacceptable. should normally be located at ground floor level and related to the commercial zone of the street frontage and the architectural design of the façade. All forms of advertisements displayed above ground floor level would in many circumstances result in visual clutter in the street scene and detract from the architectural composition and scale of the buildings to which they relate. Further detailed guidance for Shopfronts and advertisements in Conservation Areas is included in the Planning Guidance Supplementary Planning Document”*
- Delete fourth paragraph of Policy DC9
- Replace fourth paragraph of policy DC9 with the following text below: *“Buildings that are being renovated or undergoing major structural work and require scaffolding or netting around them, may be considered suitable for temporary advertisement shrouds. Advertisement shrouds are when commercial advertising forms part of a protective screen secured on scaffolding to screen buildings works being carried out. This will not be permitted where the advertisement would impose a detrimental impact on the building or street scene in terms of size, illumination and/or content: or where the advertisement would be harmful to residential amenity or public safety. Where advertisement shrouds are considered to be acceptable, they should be accompanied by a 1:1 depiction of the building and only be displayed for a limited period related to the reasonable duration of the building works. Advertisement shrouds on heritage assets will only be acceptable where the revenue generated directly contributes to the restoration of the heritage asset. In order to avoid premature or prolonged periods of display, which could be harmful to amenity, the Council will require evidence of a signed building contract where the display of an advertisement shroud is linked to building works. Where planning permission for building works is required, consent for an advertisement shroud will only be granted once planning permission has been granted and all pre-commencement conditions have been discharged.”*

- Amend third paragraph of Policy DC9 as follows: *“Hoardings and other large advertisements, such as digital screens, will be acceptable where they are of an appropriate scale with their surroundings and where they do not have a detrimental impact on areas sensitive to the visual impact of hoardings such as conservation areas, listed buildings and other heritage assets, residential areas, open spaces or waterside land”*
- Amend first paragraph of Policy DC9 as follows: *“The council will require a high standard of design of advertisements, which should be in scale and in keeping with the character of their location and should do not impact adversely on public safety. The council and will resist excessive or obtrusive advertising and inappropriate illuminated signs which adversely affect the character and appearance of the neighbourhood or the site/building, residential amenity or public safety”.*

Borough-wide Policy DC10 – Telecommunications

Organisations/Individuals that commented

Mobile Operators Association, Hammersmith & Fulham Historic Buildings Group, Mr Martin Peach, H&F Disability Forum.

General summary of representations

There was general support for this policy. One of the respondents raised concerns that the proposed policy is inconsistent with the National Planning Policy Framework (NPPF) and has suggested a wording change to the point c) of the policy from ‘adverse effects’ to ‘unacceptable impact’.

One of the local residents recommended that the installation of equipment should be prohibited in Conservation Areas or where the view from a CA is adversely affected. H&F Disability Forum highlighted the importance to ensure sufficient space on the footway for all pedestrians including wheelchair users and buggies can navigate the space safely.

One of the respondents disagreed with the alternative option.

Council’s response to representations

The council welcome the support and agree with the suggested wording change to point c) of the policy. In addition, the council notes that telecommunications equipment in conservation areas would not be supported where it would have an unacceptable impact on the area.

Action arising from representations

- Amend the wording in Policy DC10 point (c) from “adverse” to “unacceptable”.

Environmental issues, including tackling and adapting to climate change

Borough-wide Policy CC1 – Reducing Carbon Dioxide Emissions

Organisations/Individuals that commented

Groundwork London; Home Builders Federation; Environment Agency; GLA

General summary of representations

Most comments on this policy were generally supportive, although one representor commented that Policy CC1 was not compliant with national policy with regards to the Government's Zero Carbon Homes – Allowable Solutions document, with the view that the council would not be able to require applicants to adopt CC1's proposed measures or be able to specify how applicants should meet the energy efficiency requirements of the Building Regulations. The preference of this particular representor is for no additional requirements beyond those included in the Building Regulations.

Other comments included the welcoming of the inclusion of climate change as an important issue in policies such as CC1, although one representor considered that proposals for supporting adaptation could be strengthened and that the Plan should make clearer its intention to encourage and facilitate the implementation of landscape measures that promote climate adaptation.

One representor highlighted that climate change will present significant challenges for the borough and stressed the need for policies to ensure resilience to climate change risks. Potential sources of information on this issue were flagged up to help the council incorporate climate change into the plan. They also recommended that new non-household development, including refurbishments, achieve a water efficiency standard, such as BREEAM (BRE Environmental Assessment Method) 'Excellent' with maximum number of 'water credits'.

One of the representors noted that the Council will not be able to specify how applicants meet the energy efficiency requirements of Part L of the Building Regulations and therefore the Council cannot require the applicant to adopt any of its proposed measures. It will be a matter for the applicant to decide the most appropriate and cost effective route towards meeting the energy targets in the Building Regulations.

In terms of London Plan compliance, the representors' considered the policy to be broadly in accordance, although further commitment and information on the development of district heat networks in the borough was requested.

Council's response to representations

The council welcomes the support where provided and agree with a number of the comments received on this policy. Some revisions to the policy and supporting text are considered to be reasonable and have been made as outlined below. No revisions were deemed necessary in terms of making further references to heat networks as the supporting text already refers to helping to improve the provision of energy efficient and low emission heating and cooling networks in the borough.

One of the representors noted that the Council will not be able to specify how applicants meet the energy efficiency requirements of Part L of the Building Regulations and therefore the Council cannot require the applicant to adopt any of its proposed measures. It will be a matter for the applicant to decide the most

appropriate and cost effective route towards meeting the energy targets in the Building Regulations.

The council notes that reference is made to meeting the London Plan CO₂ reduction targets, however applicants have the flexibility of using a combination of on-site energy efficiency and low and/or zero carbon measures as appropriate to achieve the CO₂ reduction target. Where off-site measures are required, the London Plan allows for off-site measures to be implemented locally or elsewhere in London or for a payment in lieu to be made to offset the required CO₂ emissions. Subsequently, a minor revision has been made to include a reference to London Plan.

The council does not agree with the criticism in relation to Policy CC1 conflicting with national or regional policies, as is indicated by the GLA's comment about it being in conformity with the London Plan.

Action arising from representations

- Some minor revisions were made to the supporting text to make some more specific references to additional types of green landscaping measures such as green walls and rain gardens.
- A minor revision was made to the second paragraph in policy CC1 to include a reference to "elsewhere in London" in relation to specifying where off-site CO₂ reduction measures could be implemented. Also provide supporting for further explanation and information on payment in lieu requirements.
- Remove reference to Code of Sustainable Homes and the requirement to show compliance with the London Plans CO₂ reduction targets.
- Amend criterion b) in Policy CC1 as follows: "*Ensuring developments are designed to make the most effective use of passive design measures, and where an assessment such as BREEAM (or equivalent) is used to determine a development's environmental performance, this must be supplemented with a more detailed Energy Assessment in order to show compliance with the London Plan's CO₂ reduction targets. minimise energy use and reduce CO₂ emissions*";

Borough-wide Policy CC2 – Ensuring Sustainable Design and Construction

Organisations/Individuals that commented

Groundwork London; Home Builders Federation; Environment Agency; Liberal Democrats; Marks & Spencer Plc

General summary of representations

There was general support for this policy and supporting text. One representor was pleased to see climate change highlighted as an important issue in the policies, including CC2. Another representor was keen for the council to encourage a particular type of renewable energy generation, Ground Source Heat Pumps, which can also be used to provide cooling. Strong support was given to tackling climate change with particular encouragement for the planning system to require high levels of sustainability for new developments. Metering of all services in homes was also supported.

One representor was supportive of the use of sustainable design and construction measures in developments but felt that the policy should not differentiate between

being a requirement for major developments and only sought where feasible for the minor applications.

One comment was received in relation to it being inappropriate to specify compliance with the Code for Sustainable Homes given the Government's intentions to withdraw it.

Council's response to representations

Regarding the point raised about the differentiation between sustainability requirements for major and minor development proposals, this is considered to be acceptable and it conforms with the approach taken in the London Plan. The comments about removing references to the Code for Sustainable Homes are considered to be reasonable given its withdrawal by the Government.

The comments made about encouraging Ground Source Heat Pumps were considered to be more appropriate for inclusion in an SPD document rather than the policy text.

As all new residential properties are required to have a water meter and gas/electricity meters installed as standard requirements, no additional policy in this respect was considered necessary.

Action arising from representations

- References to the Code for Sustainable Homes have been deleted in the Policy and justification text.
- Include in the justification text that where feasible, smaller developments are also encouraged to consider sustainable design and construction principles.
- Add new justification text that new buildings need to be constructed to meet a high level of environmental performance and that major developments need to ensure that as well as reducing CO2 emissions, they also consider climate change adaptation issues in their design and construction.

Borough-wide Policy CC3 – Reducing Water Use and the risk of Flooding

Organisations/Individuals that commented

Groundwork London; Home Builders Federation; Environment Agency; Liberal Democrats; Royal Borough of Kensington & Chelsea; Thames Water Utilities Ltd

General summary of representations

Generally, the comments were supportive, with a number of representatives making positive comments to this effect. However, one representor expressed concern about many aspects of this policy because they felt it was introducing barriers to housing delivery in terms of water provision, including water efficiency measures and sewerage requirements. They considered that these issues are dealt with under separate national regulatory and statutory frameworks and should not be covered by local planning policy. A request was also made for the council to clarify if it had a SuDs Approval Body (SAB) identified to enable this policy to be implemented.

LBHF's location within an area that is considered to be seriously water stressed is also flagged up in comments and that water usage in London is higher than the

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national average. For these reasons, improving the water efficiency of new development, residential and non-residential, is highlighted as being a priority, particularly as inefficient water use can lead to unnecessary carbon emissions. As a result, achievement of high water efficiency standards in new developments is recommended. Specific attention is also drawn to the fact that non-residential buildings can consume significant amounts of water and a recommendation is made to consider that new non-household developments should achieve a high water efficiency standard.

Reference is made to the fact that developments within areas of flood risk should only be allocated/permitted if the Sequential and, where necessary, the Exception Tests have been passed with specific comments that policies and guidance on basement developments will help applicants understand the potential risks, locations to avoid and measures to make such developments safe and resilient to any potential flood risks.

A recommendation is made for a number of policy messages that need to be included in the Local Plan and/or supplementary guidance so that the recommendations of the Environment Agency's Thames Estuary TE2100 can be implemented in new developments.

A comment was also made in relation to the Local Plan helping to protect groundwater by ensuring that only appropriate land uses are located within source protection zones as outlined within the EA's groundwater protection guidance.

One representor said we should remove references to the "SuDs Approval Body (SAB)" following the Government's announcement on SuDS made on 18 December 2014 (which removed the need for councils to form SABs).

A comment was also received that whilst the existing Counters Creek sewer has been mentioned in the Strategic Site Policies, Thames Water's emerging Counters Creek Sewer Alleviation Scheme has not been referred to. The representor considers that the plan should explicitly support this scheme as a key piece of strategic infrastructure with acknowledgement that the Kensington Olympia site is required for use as a main drive site for the Scheme. The same representor also wanted alternative options for this policy to be considered in terms of sewer capacity and Counters Creek issues to consider the potential significant environmental effects, including consequential effects for sewer and basement flooding in RBKC.

Support was expressed for the requirement for all developments in the borough to incorporate SuDS as this will help to reduce the flows of storm water into the sewerage network and are necessary to help ensure that new development does not increase the risk of sewer flooding. However, comments were also received in relation to sewer infrastructure upgrade requirements in the borough and that support should be shown in the Policy for the delivery of the Counters Creek Flood Alleviation Scheme. A request was also made for an amendment in the way that the Counters Creek sewer was referenced in the document, either to refer just to the "sewerage network" or the "Counters Creek catchment".

Support was also provided for the requirement for water efficiency measures, rainwater harvesting and grey water reuse included in Policy CC3.

Council's response to representations

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Most of the comments received were supportive with constructive comments on amendments that should be made to the policy and supporting text. However, not all comments were accepted, particularly those relating to CC3 being out of step with national and regional requirements.

The policy focus is on reducing flood risk and improving water efficiency of new developments. Protecting future and current developments from flooding is considered to be a justified area for local planning policy, particularly in a borough such as Hammersmith and Fulham which has many areas at risk from a range of flood risks. The use of planning policies to reduce flood risk and to improve water efficiency is not considered to conflict with national legislation or regional policies.

The Building Regulations include an “optional standard” that is a more stringent target than the 125 litres standard and in London where there is a high level of water stress, a requirement to meet a more stringent target can be justified. The bullet point in Policy CC3 will be amended to refer specifically to London Plan requirements in terms of water consumption targets.

Comments relating to the Sequential Test are noted, although no new Sequential Test has been carried out for the borough as part of the Local Plan review. The previous Sequential Test, undertaken for the adopted Core Strategy (2011), identified that from a borough-wide perspective the Sequential Test permits the consideration of all sites for development, subject to individual sites satisfying the requirements of the Exceptions Test. The Strategic Flood Risk Assessment and Surface Water Management Plan have been used as evidence base documents to shape the Local Plan policies.

Regarding the SuDS Approval Body comments, this point will be clarified by deleting previous Paragraph 7.264. The groundwater guidance referred to in comments from the EA will be checked and considered for further reference when drafting the planning guidance SPD. Also, the comments on groundwater are noted and it is proposed to revise the text and add a bullet point to Policy CC3 covering this issue. Further guidance can be provided in the SPD document.

In relation to the comments received about the Thames Estuary 2100 Plan, Policy CC3 will be amended to summarise the TE2100 requirements in relation to development being required to maintain and where necessary enhance or raise flood defences. Additional guidance (as outlined in the EA comments) can be provided in the revised Planning Guidance SPD.

Action arising from representations

- Previous criteria (e)-(h) have been moved to new policy CC4.
- Delete all references to “SuDs Approval Body (SAB)”
- Include a new bullet point to Policy CC5 which outlines what is required as part of the FRA and includes: Where development is proposed in the Environment Agency’s Groundwater Source Protection Zones 1 or 2, measures must be taken to ensure the protection of groundwater supplies;
- As requested by the EA, new bullet point has been added to Policy CC3 which refers to Thames Estuary 2100 Plan and reads as follows: *In line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the river Thames must maintain and where necessary enhance or raise flood defences (or show how they could be raised in the future),*

demonstrating that they will continue to provide adequate flood protection for the lifetime of the development.

- With regard to the comments about Counters Creek Sewer and related issues, an acknowledgement of Thames Water's planned Counters Creek Flood Alleviation Scheme has been added to the supporting text for CC3. Also, the supporting text will be amended to refer to the sewerage network rather than the Counters Creek sewer.

Borough-wide Policy CC4 – Water Quality Policy (to be changed to Policy CC5)

Organisations/Individuals that commented

Environment Agency

General summary of representations

The representor highlighted that the council is required to help deliver the objectives of the Thames River Basin Management Plan in order to improve the status of waterbodies in the borough such as the River Thames. Also, that we should consider the recommendations in the Management Plan and to work these into planning policies as they are drafted.

Council's response to representations

Comments noted and agreed. The River Basin Management Plan recommendations relating to biodiversity and green infrastructure are covered by Policy RTC1; flood risk and use of SuDS and use of water efficiency measures are covered by Policies CC3 and CC4.

Action arising from representations

- Reference to the River Basin Management Plan's requirements will be made in the revised Planning Guidance SPD.

Borough-wide Policy CC5 – Strategic Waste Management (to be changed to Policy CC6)

Organisations/Individuals that commented

Buckinghamshire County Council; Royal Borough of Kensington & Chelsea; Port of London Authority; Environment Agency; Surrey County Council; Westminster City Council; Canal & River Trust; South East Waste Planning Advisory Group

General summary of representations

Detailed comments were received on the flows of waste into and out of LBHF which also highlighted that two of the landfill sites used to dispose of some of the borough's waste were due to close in 2015 and 2017.

The approach of London Boroughs', including LBHF, seeking to provide sufficient waste management facilities to achieve net self-sufficiency for the management of household and commercial waste for the city by 2026 is endorsed. However, respondents noted that the Local Plan does not safeguard the existing strategic waste uses in the Old Oak Regeneration Area, and therefore it is difficult to see how the current waste management capacity could be maintained. An inconsistency

between the information in the Waste Background Paper, Policy CC5 and the strategic policy for Old Oak Regeneration Area was also identified.

Concern was raised that without safeguarding existing sites or identifying new alternative sites for waste management uses, policy CC5 is not deliverable and may need to be altered. If there could be a shortfall in waste management capacity. Respondents recommended that LBHF works with other Boroughs to identify whether this could be accommodated elsewhere within London.

Safeguarding of the Powerday site was supported as it has the capacity to handle current and future waste apportionment targets set in the London Plan, but concern was raised about the EMR waste management site not being safeguarded in the same way. To the contrary a different respondent stated that retaining both the EMR and Powerday sites was considered to be unnecessary, but this was subject to the figures outlined in the Waste Background Paper being supported by the GLA and other parties. One respondent raised concern that reference to the potential spare capacity at Powerday being capable of accommodating the needs of RBKC had been removed. Clarity was requested on the role of the Powerday site in the regeneration plans for the Old Oak Regeneration Area.

Respondents raised concern that there was insufficient evidence that the borough would be able to allocate sufficient land to provide capacity to manage the required tonnages of waste in the London Plan. This was because of the uncertainty over the redevelopment of existing waste facilities in the Old Oak Common Area. Reassurance was sought that the borough, along with others, is planning to provide sufficient capacity to manage London's waste in a more sustainable way.

The identification and safe guarding of wharves and railheads for waste management purposes as well as aggregate recycling sites was also included in the comments. It was stressed that there was little provision in waste plans covering the South East of England Local Authority areas for the importation of wastes from London Boroughs and that this needed to be taken into account in the Local Plan.

A comment was received that we should have regard to the 'waste hierarchy' as referenced in key documents such as the National Waste Management Plan and also the requirements of the London Plan policies on waste management. It was also recommended that climate change impacts should be taken into account when allocating sites for waste facilities and developing policy criteria.

Two comments were received which supported the policy's approach to the use of sustainable transport, including canal waterways, to transport waste and recyclable materials.

One representor did not make comments on the policy itself but took the opportunity to start a dialogue on the potential for the boroughs to work together on meeting their waste apportionment targets.

Council's response to representations

The two safeguarded waste sites in the borough – Powerday and EMR – are within the Old Oak Mayoral Development Corporation and the council is no longer the Local Planning Authority for this area. LBHF will work with the Old Oak and Park Royal Development Corporation and the Mayor to ensure that if a waste management site is redeveloped then the capacity will be replaced elsewhere.

As we are no longer the LPA for Old Oak, the council cannot provide clarity on whether the Powerday site will continue to be a waste management site. The Old

Oak OAPF states that the Mayor is looking to relocate EMR whilst ensuring the waste apportionment targets are met.

Comments on the use of the 'waste hierarchy' to guide waste management policy and the need to take account of climate change impacts are noted, as are the comments and support for the inclusion of sustainable transport modes in relation to transportation of waste and recyclable materials are welcomed.

Comments on taking part in a dialogue with neighbouring boroughs on waste apportionment are noted. The new MDC is now the key stakeholder in terms of how waste management sites in this area can contribute to meeting waste apportionment targets. LBHF will continue to work with the WRWA constituent boroughs and with the MDC to ensure that apportionment requirements are met.

Action arising from representations

No amendments required.

Borough-wide Policy CC6 – Onsite Waste Management (to be changed to Policy CC7)

Organisations/Individuals that commented

H&F Disability Forum; Mr Anthony Williams

General summary of representations

Both representations indicated their support for the policy. The Disability Forum specifically noted that they supported the policy because it included reference to accessible and inclusive communal storage facilities.

Council's response to representations

Support noted and welcomed.

Action arising from representations

No amendments required.

Borough-wide Policy CC7 – Hazardous Substances (to be changed to Policy CC8)

Organisations/Individuals that commented

National Grid Property Ltd

General summary of representations

The policy is supported as it ensures that any remaining gas infrastructure that is required on site as part of the redevelopment proposals (at Fulham Gas Works), do not pose an unacceptable health and safety risk.

Council's response to representations

Support welcomed.

Action arising from representations

No amendments required.

Borough-wide Policy CC8 – Contaminated Land (to be changed to Policy CC9)

Organisations/Individuals that commented

Environment Agency

General summary of representations

The comments stressed that the Local Plan policies should encourage redevelopment of sites affected by land contamination and that where sites are found to have unacceptable levels of contamination, they should be remediated through redevelopment.

The point was also made that planning applications for potentially contaminated or contaminated sites within groundwater sensitive areas should be accompanied by a Preliminary Risk Assessment and if necessary a Site Investigation.

Council's response to representations

The comments are noted. The issues raised are already part of the policy or covered in the Planning Guidance SPD.

Action arising from representations

No changes to policy text required.

Borough-wide Policy CC9 – Air Quality (to be changed to Policy CC10)

Organisations/Individuals that commented

Tri-Borough Public Health; Environment Agency

General summary of representations

One respondent noted that the main source of air pollution is transport and commented that they expect that local plan policies should reference and link with the council's Air Quality Action Plan and the Mayor of London's Air Quality and Transport Strategies.

The other respondent commented that Policy CC9 is limited to the impact of new developments and that they wanted it to be strengthened and to go further in addressing air quality issues covering additional areas such as promoting active travel. The health impacts of particulate matter emissions were also highlighted as a reason to strengthen the policy.

Council's response to representations

The local plan policies and supporting text already refer to the council's Air Quality Action Plan and the Mayor of London's Air Quality and Transport Strategies.

The Local Plan specifically sets out policies that apply only to new development, although active travel options such as cycling and walking are promoted in this and other policies. This policy directly addresses the impacts of poor air quality from both nitrogen dioxide and particulate matter and it is right that both are highlighted as these are the main pollutants of concern in the borough.

Action arising from representations

- No changes to the text proposed.
- Reference air quality action plan.

Borough-wide Policy CC11 – Noise (Previously Policy CC10)

Organisations/Individuals that commented

Imperial College London

General summary of representations

The representor states that there are few places within the borough that would not be affected by external noise from a range of background sources which can rarely be controlled. A request is made for the reference to external noise to be removed from the policy in terms of restricting noise sensitive developments where there are adverse noise impacts.

Council's response to representations

Comments noted. The council consider the reference to external noise to be valid but agree that it will not always be appropriate to apply this in all circumstances. Developments will need to be considered on a case by case basis against the policy.

Action arising from representations

No changes to text required.

Borough-wide Policy CC12 – Light Pollution (Previously Policy CC11)

Organisations/Individuals that commented

Hammersmith Society

General summary of representations

An amendment was suggested for the policy to include reference to internal lighting as well as external. Also recommendations were made for the inclusion of an extra bullet point that requires controls to switch off lights above ground level when buildings are not in use and a further bullet point which requires that LED street lighting is no brighter than conventional street lighting.

Council's response to representations

The comments are welcome and will be passed on to the council street lighting and highways teams.

Action arising from representations

No changes to text required.

Transport and Accessibility

Borough-wide Policy T1 – Transport

Organisations/Individuals that commented

Tri-Borough Public Health; Liberal Democrats; Port of London Authority; Greater London Authority; Hammersmith Society; Royal Borough of Kensington & Chelsea; Canal & River Trust; West London Link Design; West London Line Group; Mr Martin Peach; H&F Disability Forum

General summary of representations

There is generally strong support for this policy and with the view that non-car modes of transport should be strongly encouraged and also for the use of our waterways for the movement of freight and passengers.

One of the representors suggested that the policy could be strengthened by promoting cycling through the greater provision of legible cycle ways and cycle loops across the borough. Similarly the references to walking could be improved through reference to legible and attractive pedestrian routes around the borough.

The Port of London Authority supports the policy approach to the use of the River Thames for freight and passengers and questions why this approach isn't adopted throughout the plan. However, they are of the opinion that the selective approach - both in timescale and cargo types - to freight transport, is not in general conformity with the London Plan. The PLA also note that an approach to the consolidation of the Borough's safeguarded wharfage is proposed, but with no indication as to where this can be undertaken or indeed whether such an approach can even be implemented, is not in general conformity with the London Plan and should be deleted.

The GLA provided a detailed submission with the following comments:

- the case for a station in the North Pole Road area is unlikely to be justifiable due to the close proximity of existing stations (including the proposed Overground station at Old Oak Common) and the additional call on West London line services will extend journey times to through passengers which are unlikely to be justified by the additional demand generated. Therefore TfL is unable to support a station in this location and have requested that reference to this is deleted.
- TfL and Network Rail proposed that a station serving Chelsea would be located on King's Road near the fire station, as is currently safeguarded and would improve rail based public transport accessibility. Consultation feedback showed overall support for the station, however there were a number of suggestions proposed for alternative station locations in the area. TfL and Network rail agreed that these should be looked at in more detail. Further research suggested that it is not proposed that Crossrail 2 will serve Imperial Wharf.
- TfL does not consider that a new London Underground (LU) station at Du Cane Road is a feasible option and that the benefit for the people that would be using the station could not offset the dis-benefit of longer journey times imposed on passengers on the rest of the Central Line.

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- In regards to the increased capacity of the Piccadilly and District Lines - this proposal is aligned with TfL's vision and target to reduce Tube delays by 30% by the end of 2015. They advised that the District Line with walk through carriages that are also wider will significantly increase the Line's capacity and that the Piccadilly Line is part of the New Tube for London project which aims upon completion to have increased the Line's capacity by 60% (space for additional 19000 passengers per hour).

One of the representors requested a borough wide policy for treatment of pavement tree surrounds which is practical and aesthetically pleasing as well as meeting safety considerations. The same respondent also recommended that we encourage buff-coloured tactile paving and location of zebra Crossings on suitable desire lines to promote pedestrian safety on busy roads. With particular mention that the ongoing Shepherds Bush street upgrade did not include more zebra crossings on Goldhawk Rd (despite public consultation).

One of the respondents requested a separate policy section for the Thames and for the Grand Union Canal in the light of new opportunities at Old Oak Regeneration Area, HS2, etc.

One of the respondents made recommendations to be considered in a policy to cater for growth before future corrective action is constrained by the Old Oak development and before the opening of Crossrail and HS2 Phase 1.

One of the respondents requested that bullet 1 is amended to remove reference for the road to replace all of the A4 as there was preference for the tunnel to replace only the Hammersmith Flyover and not to extend beyond the borough.

Two respondents supported the Crossrail 2 station. One representor recognised the benefits it may bring to South Fulham Riverside, however noted that it doesn't appear to be included in any of the current TfL plans. The other respondent also saw merit in an interchange station at Imperial Wharf.

The West London Line Group requested that the Borough will support the Group's proposals for the correct development, layout and connections between, to and from all the rail links at Old Oak Common.

One of the local respondents noted that the frequency of the Overground service needs to be increased and that new bus services need to be introduced to serve the growing populations in the north of the borough and in south Fulham.

H&F Disability Forum support this policy because it promotes "securing improvements for all, particularly people with disabilities". They are also keen to see improvements to the pedestrian environment with well-maintained footways, street level pedestrian crossings and Legible London signage. They do not support the bullet point combining walking with cycling because it does not give proper consideration to walking issues. In addition they requested the inclusion of two additional bullet points:

- "Increasing the opportunities for walking for all for example, by extending an accessible and inclusive Thames Path National Trail, accessible and inclusive improvements to the pedestrian environment throughout the borough" and
- "seeking to improve cycling by supporting the Mayor's Cycling Vision"

These additions are sought for T1 to conform to London Plan policy 6.10 and Accessible London SPG and that the pedestrian environment in Hammersmith and Fulham should be accessible and inclusive for wheelchair users or visually impaired people. Accessible London includes guidance on assessing the pedestrian environment from the perspective of disabled people.

Council's response to representations

The council welcomes the support and note that the policy approach to the use of the River Thames for freight and passengers is reflected elsewhere in the Local Plan.

In regards to the comment about promoting cycling and walking through the greater provision and reference of legible cycle ways and attractive pedestrian routes around the borough, this is covered in the Mayor's Vision for Cycling, which includes the development of a network of Cycling Quietways. The council is developing its own cycling strategy to be used and implemented when finished.

In response to the PLA's comments, the council does not agree that the policy conflicts with either the PLA's position or that of the London Plan and that it would not be appropriate to use the river for freight where there is not sufficient road capacity for transhipment or if there were overwhelming environmental concerns.

In regards to the comments by the GLA, the council notes that future increases in capacity of the West London Line and developments around the station sites could change the situation and therefore it would not be appropriate to rule out the possibility of additional stations for all time. The council also notes that future development at Hammersmith Hospital/Imperial College/Wormwood Scrubs Prison sites could make an additional/relocated station viable, however at present is willing to discuss these specific proposals when further information is known and available. Therefore the council will continue to promote the routing of Crossrail 2 via South Fulham with an interchange at Imperial Wharf.

The council notes that paragraphs 7.187 and 173 within "Streetsmart" deal with the treatment of pavement tree surrounds and also that this document recommends blue for tactile paving. The comments received can be considered as part of Streetsmart review. It is important for visually impaired people that there is a contrast between the tactile paving and the surrounding material. In regards to the zebra crossing, the Transport and Highways Department practice is to consult on such schemes as part of the LIP (Local Implementation Plan). Zebra crossings are not always the most appropriate solution, and the Shepherd's Bush town Centre West Scheme concentrated on improving the existing signalled crossings and providing additional ones.

The Old Oak Regeneration Area refers to the heritage value of the Grand Union Canal and the opportunities presented by it. However, it should be noted that the canal now falls within the Old Oak and Park Royal Development Corporation.

Detailed studies on possible A4 tunnels are currently underway and options which are longer than the present flyover may turn out to be the most cost effective. However, as there is no possibility of tunnelling the entire A4 between London and Bristol, the council agrees with the request to remove the word "all" in the first bullet point of the policy.

The council recognise that West London Line Group's proposal for a new 12-car six platform WLL facility on top of the HS2 station box and above that for Crossrail and

the GWML services at Old Oak Common would be the ideal solution, however it is noted that there are practical constraints that make it impossible in the shorter term.

In regards to the additional requests the WLL Group is advocating to cater for growth, the council note that these are longer term aspirations and oversight of more detailed justifications is necessary before the council can commit to supporting them.

In regards to the concerns raised by H&F Disability Forum, the council agrees with the recommended additional points and note that TfL are working on the development of more refined assessment methods for transport assessments.

Action arising from representations

- Amend bullet point 9 of Policy T1 to read:

“Increasing the opportunities for walking, for example by extending the Thames Path National Trail and other legible and attractive pedestrian routes around the borough, and for cycling by supporting the Mayor’s Cycling Vision and developing and implementing the Council’s own cycling strategy”.

- Delete the word “all or” in the first bullet point of para T1.
- Add following bullet point to ‘Major Scheme Targets’ – ‘*Continuing to promote major improvements with new stations and enhanced local and sub-regional passenger services on the West London Line*’.
- Amend the 9th bullet point so that it forms 2 separate bullet points that read:
“Increasing the opportunities for walking for all, for example by extending an accessible and inclusive Thames Path National Trail and accessible and inclusive improvements to the pedestrian environment throughout the borough;
“Increasing the opportunities for cycling by supporting the Mayor’s Cycling Vision and developing and implementing the Council’s own cycling strategy”.
- Remove ‘Seeking a new station on the Central Line at Du Cane Road’ from the list of Borough Wide Targets.

Borough-wide Policy T2 – Transport assessments and travel plans

Organisations/Individuals that commented

Greater London Authority; Mr Martin Peach

General summary of representations

Both representors supported the policy and one of them noted that the cumulative effect of smaller schemes can be significant and needs to be taken into account. One of the respondents welcomed the reference to cycle and car parking standards in accordance with the London Plan and noted that there are existing area wide parking policies for regeneration areas including Earls Court and White City.

Council’s response to representations

Council welcome the support.

Action arising from representations

None

Borough-wide Policy T3 – Vehicle Parking Standards (Reg. 19 Publication version reference: T4)

Organisations/Individuals that commented

Tri-Borough Public Health; Greater London Authority; National Grid Property Ltd; Capital and Counties on Behalf of Earls Court and Olympia Group; Imperial College London; H&F Disability Forum

General summary of representations

There is generally strong support for this policy and that the cycle and car parking standards are in accordance with the London Plan. One representor requested that this policy be broadened to reference cycle parking as well as car parking as it would convey a clearer message about active travel, or alternatively signpost the reader to policy T4.

With regard to parking standards in specific locations, one of the respondents noted that there are existing area wide parking policies for regeneration areas including Earls Court and White City.

Another representor noted that on site car parking in residential developments will typically be at basement and/or podium level and therefore incorporating car parking spaces within the footprint of a building will optimise the level of housing and public open space that the site can accommodate.

One of the respondents requested amendments to the supporting text to remove ambiguous text and remove the reference to 'essential' needs. One representor noted that the car parking standards in Table 7 within this policy refers to retail only and there are no standards for any other uses.

Council's response to representations

The council welcomes the support and note that cycle parking standards are covered in Policy T4. Car parking standards are generally maxima, while cycle parking standards are minima.

Restraint-based parking standards are an important part of the strategy to reduce congestion and encourage the use of sustainable transport, therefore the council would not support providing parking to meet unlimited demand. In addition, details of parking layout will be dealt with in the Planning Guidance SPD.

In regards to the request to remove the reference to 'essential' needs, the council considers that there is little difference between the existing paragraph and the wording suggested and therefore do not consider any change necessary.

Action arising from representations

Full car parking standards have now been included as an Appendix in the Local Plan.

Borough-wide Policy T4 – Increasing opportunities for cycling and walking (Reg.19 Publication version reference: T3)

Organisations/Individuals that commented

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Proposed Submission Local Plan

Tri-Borough Public Health; Greater London Authority; National Grid Property Ltd;
Capital and Counties on Behalf of Earls Court and Olympia Group; Mr Anthony
Williams; H&F Disability Forum

General summary of representations

There is generally support for this policy and the reference to cycle and car parking standards in accordance with the London Plan. One of the representors suggested we strengthen the policy by referencing legible, attractive cycle ways and pedestrian routes around the borough – to achieve a modal shift in transport choices. Another representor drew the council's attention to the existing area wide parking policies for regeneration areas for parking standards in specific locations.

One of the respondents recommended a wording change to the 2nd bullet point in the policy to make reference to the transport mitigation measures in association with the TfL's Cycle Hire scheme. There was also a suggestion that the East West Cycle Superhighway should be referred to within the document.

Several of the representatives also noted that Table 8 needs to be amended so that it is consistent with the London Plan and that separate borough specific minimum standards are unnecessary.

Hammersmith and Fulham Disability Forum recommended minor wording changes to promote more people walking further with accessible and inclusive pedestrian crossings and footways to relieve pressure on public transport. These changes would conform with London Plan policy 6.10 walking and Accessible London SPG.

Council's response to representations

The council welcomes the support and note that the policy refers to contributions to the cycle hire scheme and that the purpose of all developer contributions is to mitigate their effect on the network and therefore do not agree with the recommended change.

The justification text refers to the Mayors' Cycling vision, which includes the East-West superhighway and other schemes such as Quietways and therefore no further change is required.

In regards to the cycle standards, the council notes that these are based on an analysis of what would be required to enable modal split of 10-20% for journey to work.

Action arising from representations

- Amend 3rd bullet point to include 'inclusive' and amend the 4th bullet point to include 'accessible and inclusive' pedestrian access.

Borough-wide Policy T5 – Housing with reduced parking

Organisations/Individuals that commented

National Grid Property Ltd; Capital and Counties on Behalf of Earls Court and Olympia Group; Mr Anthony Williams, Mr Martin Peach

General summary of representations

There is generally support for this policy and the flexibility for developers to meet market requirements for car parking to be provided.

Consultation Statement
Proposed Submission Local Plan

Several of the comments received on the wording of the policy considered it to be ambiguous. Two of the representors noted that Policy T5 refers to “good levels of public transport accessibility” and considered this wording to be ambiguous. Another representor noted that reference to PTAL would be useful and that a specific minimum PTAL rating is quoted rather than ‘good’ or ‘reasonable.’

Another representative raised concerns with car parking requirements for new social/affordable housing to meet the needs of the tenants and considered this ambiguous and that there is also a practical issue with the service charge, which in some instances could prejudice the affordability of some homes which would render allocated parking unusable. These could result in reducing the viability, and delivery of affordable housing.

One of the representors supports "permit-free" housing and suggested alternatives such as providing additional cycle parking and/or car sharing/rental facilities particularly for social housing. Subsequently more housing could then be provided or allowed.

One representor was of the opinion that the policy is not consistent with policy for market/intermediate housing, which states that if the homes are in an area with good public transport accessibility, car parking may be reduced or exempt. They also drew the council's attention to existing research which found that even in areas with high public transport accessibility people still wish to own a car, but commute to work by public transport and that there is no link between car ownership and car use and between the desire to own a car and PTAL.

Council's response to representations

This policy has been deleted as part of revisions made to the transport section of the Proposed Submission Local Plan.

Action arising from representations

None

Borough-wide Policy T6 – Parking for blue badge holders (Reg. 19 Publication version reference: T5)

Organisations/Individuals that commented

National Grid Property Ltd

General summary of representations

The only representor supported this policy and its aim to provide blue badge parking spaces in vehicle accessible developments.

Council's response to representations

Council welcome the support

Action arising from representations

None

Borough-wide Policy T7 – Hierarchy of roads (Reg. 19 Publication version reference: T6)

Organisations/Individuals that commented

Consultation Statement
Proposed Submission Local Plan

Capital and Counties on Behalf of Earls Court and Olympia Group; Mr Anthony Williams

General summary of representations

There is a mix of support and opposition to this policy. One of the representors considered that the alternate is preferable as Policy T2 already requires development proposals to be assessed in terms of traffic generation and congestion. The supporting text explains this will assist the council in determining what quantum of development is acceptable, however, they considered it unnecessary and potentially prejudicial to introduce additional regulation according to road hierarchy.

The other representor agreed with the approach of the policy but questions how Tier 4 – Local Access Roads have been assessed and that there are many other roads which also have through traffic.

Council's response to representations

The council welcomes the support and notes that different types of road perform different functions and therefore it is appropriate that development proposals should take this into account. In addition, the policy states that the purpose is for local access, and their use by through traffic should not be encouraged. Further explanatory text is also provided in the justification following the policy. Measures to address this are a consideration for the Transport Local Implementation Plan (LIP).

Action arising from representations

None

Delivery and Implementation of the Local Plan

Organisations/Individuals that commented

West Kensington and Gibbs Green Community Homes; West Kensington Estate TRA and Gibbs Green and Dieppe Close TRA; Mr Martin Peach; H&F Disability Forum; Ptarmigan Riverside AW LLP; Cargiant and London and Regional; London Fire and Emergency Planning Authority

General summary of representations

The support for this policy was noted. Ptarmigan Riverside AW LLP did not consider the Local Plan policies and CIL charge viable. The comments generally discuss the delivery of affordable housing, viability and local land values; the price a developer pays for a piece of land will determine the level of affordable housing delivered on any site, the Viability Test therefore is likely to reflect the price the developer paid for the land, and will impact upon the amount of affordable housing delivered on any site.

A further comment requested clarification between the council and the Old Oak Park Royal Development Corporation.

Council's response to representations

The council's Community Infrastructure Levy was adopted following independent examination in September 2015. All comments made in response to the Charging Schedule have been considered by the Examiner and have been considered viable.

The council does not consider it necessary to change the policy with regard to the approach to viability. The introduction of CIL is envisaged to make it clear the expectations and costs associated with any development proposal, which developers need to factor in when considering any purchase of land for development. Local Plan policy, HO3 Affordable Housing, sets out the council's approach to the supply of, as well as providing guidance on affordable housing negotiations.

Since the Old Oak and Park Royal Development Corporation has come into effect, the council has relinquished direct planning powers over the administrative area. The council continues to work with the Development Corporation to assist and support, where possible.

Action arising from representations

None

Planning Contributions and Infrastructure

Planning contributions and infrastructure

Organisations/Individuals that commented

London Fire and Emergency Planning Authority; Mr Martin Peach; H&F Disability Forum; Cargiant and London and Regional

General summary of representations

Comments of support were noted and welcomed. A concern was raised about provision of funding available to deliver the infrastructure identified in the Local Plan. National Grid Property Ltd comment that the plan should acknowledge the impact infrastructure may have upon the viability of development. There was a concern raised with the arrangements and responsibilities between Hammersmith and Fulham Council and OPDC.

Council's response to representations

With regard to the funding available to deliver the infrastructure in the Local Plan; viability considerations will inform the amount of funding available and sought from developers. The schedule identifies an indicative itemised list and possible funding streams for the schemes that indicates service need in line with the council's objectives of which the Council will seek to negotiate funding for to ensure their delivery, where possible. It is recognised that a balance will need to be made in seeking contributions for differing purposes and in identifying spend from CIL. The proposed policy Delivery and Implementation makes specific reference to the impacts of viability of plan making, CIL and S106 agreements.

It should be noted that the schedule has been moved to a separate document, the Infrastructure Delivery Plan, to allow this to be updated and monitored on a regular basis with input from service and infrastructure providers.

The OPDC has taken over as the Planning Authority for this area.

Action arising from representations

No action required.

Glossary

Organisations/Individuals that commented

Hammersmith & Fulham Historic Buildings Group; Royal Borough of Kensington & Chelsea; Hammersmith Society; H&F Disability Forum;

General summary of representations

A number of representations noted some additional terms and amendments to the Glossary, including: 'permeable' and 'legible'; the definition of 'SHMA', accessible and inclusive design, supported and special needs housing, amendment to the definition of Conservation Area, Listed Building and Local Building of Merit, Metropolitan Open Land, and Tall Buildings.

Council's response to representations

The council notes the additions and amendments. Some amendments to definitions have been noted. Some of the terms in the Glossary are already included in other documents, such as the London Plan and is not necessary to duplicate these. Hammersmith & Fulham Historic Buildings Group made comments to change the existing terms, the council has assessed and considered these against the relevant guidance/statutory documents.

Action arising from representations

Add to the Glossary:

- Legibility – The degree to which a place can be easily understood and traversed
- Permeability – The degree to which an area has a variety of pleasant, convenient and safe routes through it.
- Definition of SHMA;
- Amendments made to the definitions of Local Buildings of Merit and Conservation Area.

Appendices

Appendix 3 – Open Space Hierarchy

Organisations/Individuals that commented

Liberal Democrats; Hammersmith & Fulham Historic Buildings Group

General summary of representations

The Liberal Democrats noted that the Green Corridor along the West London Line, though not accessible to the general public, does provide visual openness and support wildlife. Hammersmith & Fulham Historic Buildings Group requested for Little Wormwood Scrubs and the Riverside Walk be included as Metropolitan Open Land. Furthermore, they requested for a further category of 'Pocket Parks' for smaller spaces in the Open Space Hierarchy.

Council's response to representations

Comments noted. In response to the area along the West London Line, this as well as the land along the Central Line is already identified as such in Appendix 4.

Regarding the suggestions for the inclusion of Little Wormwood Scrubs, the moated site and adjacent land at Fulham Palace, the paddock to the rear of All Saints' Hall, Fulham High Street and the riverside walk as Metropolitan Open Land. The definition and criteria of Metropolitan Open Land is set out in the London Plan, Little Wormwood Scrubs is not considered to meet this. The council notes the comments to the green chain alongside the River Thames and the conclusions made by the Inspector. The council decided that MOL designation was not necessary and such an issue needed a consistent strategic approach from all boroughs. This is still considered relevant. The moated site is designated as a Strategic Ancient Monument, however does not meet the MOL criteria.

The council does not consider a further category for Pocket Parks necessary; all open spaces are protected by open space policies within the Local Plan.

Action arising from representations

No changes arising from representations.

Appendix 4 – Nature Conservation Areas and Green Corridors

Organisations/Individuals that commented

Hammersmith & Fulham Historic Buildings Group

General summary of representations

The Hammersmith & Fulham Historic Buildings Group requested that the river and riverside walk, the canal and its towpath are added as green corridors.

Furthermore, the group proposed for Scrubs Wood, Wormwood Scrubs and Old Oak Common to category of Metropolitan Importance due to their importance as nature reserves.

Council's response to representations

The council notes these comments. The Thames is a nature conservation area of metropolitan importance and therefore has greater ecological significance than a

green corridor – consequently there is no need to double designate this area. The riverside walk, whilst green in parts, is primarily a public walkway. It is designated as the Thames Path National Trail and does not merit green corridor status.

In regard to land of Metropolitan Importance, the hierarchy of conservation areas was originally designated by the former London Ecology Unit. Whilst this has not been reviewed as part of the London Plan process, the council will consider how and when a review of this could take place.

Action arising from representations

None.

Appendix 6 – Local Plan Monitoring Indicators

Organisations/Individuals that commented

Tri-Borough Public Health; Liberal Democrats; H&F Disability Forum;

General summary of representations

The comments were in general support, with some specific recommendations. The Tri-Borough Public Health teams are generally supportive, however proposed a further indicator/target for OS5- 'net gain in green infrastructure'; CF1 to include 'net gain in school places, net gain in childcare nursery places, net gain in leisure facilities.' The Liberal Democrats commented there could be further indicators for measuring sustainability and reducing climate change impact, including increased cycle parking, cycle lanes, reduction in car ownership, and others. H&F Disability Forum commented that a further indicator for housing should include the number and percentage of completions in any year.

Council's response to representations

All comments noted. In response to the suggestion for further indicators for OS5, these comments are noted and welcomed. A number of these are monitored as part of indicators contained in the Environmental Sustainability policies and is not considered necessary to add further indicators to the Local Plan. This also applies to the comments made by the Liberal Democrats, there are a broad range of indicators across the Local Plan that pick up these issues, such as CC1, CC3, CC6, T1, T3, T4.

The council does not consider it necessary to include additional monitoring indicators for school and nursery places and leisure facilities. In terms of school place planning, this is a complex matter and whilst there is a correlation between development and school places, other factors such as school admissions policy, parental choice, accessibility and capacity in existing schools all factor into school demand and supply of places. The Schools department undertake monitoring on this and is more suitable than the planning department to do so. In terms of leisure facilities, the council does not consider it necessary to introduce monitoring indicators for this purpose. Whilst the council seeks to ensure a range of facilities are available in the borough and as part of new development leisure facilities may be suitable, however the use and access to these facilities is led by individual choice in terms of location and price in the London context.

Action arising from representations

Add the number of housing completions as an indicator.

Appendix 7 – Infrastructure Schedule

Organisations/Individuals that commented

Hammersmith and Fulham Clinical Commissioning Group (CCG); National Grid Property Ltd; H&F Disability Forum; West London Line Group

General summary of representations

H&F Disability Forum requested the Schedule be updated. The CCG requested the opportunity to update the infrastructure schedule and to review the Development Infrastructure Funding Studies for the White City and South Fulham regeneration areas and options and use of S106. National Grid Property Ltd noted that development of the Fulham Gasworks site includes the provision of infrastructure items will impact upon the viability of development, as well as adding an item to the Schedule. West London Line group also requested for specific items to support West London Line be added and funded by CIL.

A number of comments request for the lists to be updated where schemes have already been completed. The London Fire and Emergency Planning Authority requested that the Infrastructure Schedule (Reg. 18 version of the plan included the Schedule as an appendix) include the maintenance costs for two sites located in the borough; the West London Line Group requested for items to be added; and, the Hammersmith and Fulham Clinical Commissioning Group asked to update the schedule.

Council's response to representations

All comments noted. In response to viability, policies Delivery and Implementation and Planning Contributions and Infrastructure set out the Council's approach in accordance with the NPPF. The Schedule will be updated to reflect the most up to date position and infrastructure requirements.

The Council notes the requests made for further items to be added to the Infrastructure Schedule. It should be noted that inclusion on the schedule does not mean the council is under any legal obligation to provide Section 106 or CIL funding to the proposed work. The council will continue to work with services and, where possible, to support the proposed schemes.

It should be noted that the Council has produced a separate document, the Infrastructure Delivery Plan where the Schedule will be monitored and maintained.

Action arising from representations

- Add infrastructure items identified by London Fire and Emergency Planning Authority to the Schedule (now contained in the Infrastructure Delivery Plan).

4. Appendices

Appendix B - Letters

Copy of letter sent to Statutory consultees and Duty to co-operate consultees

Dear Sir/Madam,

Draft Local Plan (Regulation 18) Consultation – Hammersmith and Fulham Council

Hammersmith and Fulham Council is currently consulting on a draft Local Plan which outlines the Council's vision and preferred options for development in the borough for the next 20 years, including the identification of five key regeneration areas, strategic sites for development and options for policies on topics such as housing and the built environment. The Council is also consulting on Proposals Map changes and an Environmental Report which accompany the draft Local Plan.

The Council is keen to ensure that anyone with an interest in the borough has the opportunity to comment on the draft Local Plan. In accordance with the Localism Act (2011) and the National Planning Policy Framework (para 178), the Council has a Duty to Co-operate with bodies prescribed under Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on planning issues that cross administrative boundaries, particularly those that relate to strategic matters. As one such body, the Council would welcome any comments you may have regarding issues of a strategic cross-boundary nature.

It should be noted that one of the regeneration areas identified in the draft Local Plan is in the north of the borough at Old Oak Common. However, this area could be designated by the Mayor of London as a Mayoral Development Area in April 2015. If this happens, planning powers and policy formulation for this area will become the responsibility of a Mayoral Development Corporation (MDC) rather than this council.

The Draft Local Plan and associated documents can be viewed on the council's website at www.lbhf.gov.uk/localplan. To make comments on these documents please use one of the following methods:

- Online: www.lbhf.gov.uk/localplan
- Email: localplan@lbhf.gov.uk
- Letter: Development Plans Team, Planning Division, Transport and Technical Services Department, Hammersmith Town Hall Extension, King Street, W6 9JU

Please send any comments you have on the draft Local Plan and associated documents by 5pm on 20th February 2015. If you require further information about the draft Local Plan please contact us or visit our website. We look forward to hearing from you.

Yours sincerely



David Gawthorpe, Deputy Team Leader, Development Plans
Policy and Spatial Planning, Transport and Technical Services

Copy of letter sent to general consultees, agents and resident associations

Dear Sir/Madam,

Draft Local Plan (Regulation 18) Consultation - Hammersmith and Fulham Council

Hammersmith and Fulham Council is currently consulting on a draft Local Plan which outlines the Council's vision and preferred options for development in the borough for the next 20 years. It includes the identification of five key regeneration areas, strategic sites for development and options for policies on topics such as housing and the built environment. The Council is also consulting on Proposals Map changes and an Environmental Report which accompany the draft Local Plan.

This consultation represents the first formal public participation stage in the production of the Local Plan (See copy of Public Notice on reverse of this letter). As this is a draft document it contains alternative approaches, which the Council has considered, but has not selected as its preferred approach. The Council is seeking your comments not only on the preferred approach, but also on the alternative options which have been suggested.

It should be noted that one of the regeneration areas identified in the draft Local Plan is in the north of the borough at Old Oak Common. However, this area could be designated by the Mayor of London as a Mayoral Development Area in April 2015. If this happens, planning powers and policy formulation for this area will become the responsibility of a Mayoral Development Corporation (MDC) rather than this council.

The Draft Local Plan and associated documents can be viewed on the council's website at www.lbhf.gov.uk/localplan. To comment on these documents please use one of the following methods:

- Online: www.lbhf.gov.uk/localplan
- Email: localplan@lbhf.gov.uk
- Letter: Development Plans Team, Planning Division, Transport and Technical Services Department, Hammersmith Town Hall Extension, King Street, W6 9JU

Please send any comments you have on the draft Local Plan and associated documents by 5pm on 20th February 2015. If you require further information please contact us or visit our website. We look forward to hearing from you.

Yours sincerely



David Gawthorpe
Deputy Team Leader, Development Plans
Policy and Spatial Planning, Transport and Technical Services

Copy of letter sent libraries

Dear Sir/Madam,

Planning documents – London Borough of Hammersmith and Fulham

Please find enclosed a copy of the council's draft Local Plan and Proposals Map changes. These documents are available for public consultation until **Friday 20th February 2014**.

Hammersmith and Fulham Council's draft Local Plan outlines the Council's vision and preferred options for development in the borough for the next 20 years. It includes the identification of five key regeneration areas, strategic sites for development and options for policies on topics such as housing and the built environment. The Council is also consulting on Proposals Map changes and an Environmental Report.

We would be grateful if you could make these documents available to visitors and display where possible during this six week period of consultation.

The Draft Local Plan and associated documents can also be viewed on the council's website at www.lbhf.gov.uk/localplan. To comment on these documents visitors to the Library are encouraged to use one of the following methods:

- **Online:** www.lbhf.gov.uk/localplan
- **Email:** localplan@lbhf.gov.uk
- **Letter:** Development Plans Team, Planning Division, Transport and Technical Services Department, Hammersmith Town Hall Extension, King Street, W6 9JU

Many thanks for your help. If you have any queries please do not hesitate to get in touch.

Yours faithfully



David Gawthorpe
Deputy Team Leader, Development Plans
Policy and Spatial Planning, Transport and Technical Services

Copy of letter sent to retail premises

Dear Sir/Madam,

Draft Local Plan (Regulation 18) Consultation – London Borough of Hammersmith and Fulham

Hammersmith and Fulham Council is currently consulting on a draft Local Plan which outlines the Council's vision and preferred options for development in the borough for the next 20 years. It includes the identification of five key regeneration areas, strategic sites for development and options for policies on topics such as housing and retail. In particular the draft Local Plan identifies local shopping parades and includes policy options for these areas.

As an owner/occupier of a premises which falls within or adjacent to one of the borough's designated local shopping parades. We would welcome your views on proposed amendments in the draft Local Plan to the boundaries of these shopping parades/centres. The proposed amendments to the local shopping parades are shown in the booklet of Proposals Map changes (see pages 3 and 8 on retail designations and maps AD8 and AM16 – AM23). The relevant draft policy for the local shopping parades/centres (TLC4) is located on page 135 of the draft Local Plan.

The Draft Local Plan and Proposal Map changes can be viewed on the council's website at www.lbhf.gov.uk/localplan. To comment on these documents please use one of the following methods:

- Online: www.lbhf.gov.uk/localplan
- Email: localplan@lbhf.gov.uk
- Letter: Development Plans Team, Planning Division, Transport and Technical Services Department, Hammersmith Town Hall Extension, King Street, W6 9JU

Please send us any comments you have on the draft Local Plan and associated documents by 5pm on 20th February 2015. If you require further information please contact us or visit our website. We look forward to hearing from you.

Yours sincerely



David Gawthorpe
Deputy Team Leader, Development Plans
Policy and Spatial Planning, Transport and Technical Services

Copy of letter sent to waste consultees

Dear Sir/Madam

Draft Local Plan (Regulation 18) Consultation – Waste Planning

Hammersmith and Fulham Council is currently consulting on a draft Local Plan which outlines the Council's vision and preferred options for development in the borough for the next 20 years. This includes the council's policies around waste planning, including management of the borough's allocated waste apportionment under the London Plan. To support development of the Local Plan waste policies, the council has prepared a background paper on Waste which can be viewed on the council's website at www.lbhf.gov.uk/localplan

In accordance with the Localism Act and the National Planning Policy Framework (para 178), the Council has a Duty to Co-operate with bodies prescribed under Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on planning issues that cross administrative boundaries, particularly those that relate to strategic matters. In recognition of the strategic and cross-boundary nature of waste management, and potential waste planning inter-relationships between our organisations, we would welcome any comments you may have on the draft Local Plan and the accuracy and significance of waste movements identified.

The two major strategic waste sites in the borough are located in the north of the borough at Old Oak Common. However, this area could be designated by the Mayor of London as a Mayoral Development Area in April 2015. If this happens, planning powers and policy formulation for this area will become the responsibility of a Mayoral Development Corporation (MDC) rather than this council.

The Draft Local Plan and associated documents can be viewed on the council's website at www.lbhf.gov.uk/localplan. To make comments on these documents please use one of the following methods:

- Online: www.lbhf.gov.uk/localplan
- Email: localplan@lbhf.gov.uk
- Letter: Development Plans Team, Planning Division, Transport and Technical Services Department, Hammersmith Town Hall Extension, King Street, W6 9JU

Please send any comments you have on the draft Local Plan and associated documents by 5pm on 20th February 2015. If you require further information about the draft Local Plan please contact us or visit our website. We look forward to hearing from you.

Yours sincerely



David Gawthorpe, Deputy Team Leader, Development Plans
Policy and Spatial Planning, Transport and Technical Services

Copy of communication to borough schools



Title:	Draft Local Plan – Public Consultation
Summary:	The Draft Local Plan sets out the vision, objectives and detailed spatial strategy for future development in Hammersmith and Fulham up to 2035 along with specific development management policies.
Target school(s):	All
Specific schools	
For attention of:	Heads, bursars
Author:	David Gawthorpe
Contact:	David Gawthorpe, Deputy Team Leader, Development Plans team, London Borough of Hammersmith and Fulham
Email:	localplan@lbhf.gov.uk
Telephone:	0208 753 3384
Date:	Wednesday 14 th January 2015
Action required/ due date:	The Council is seeking your comments on the draft Local Plan. Please send any comments you have on the draft Local Plan and associated documents by 5pm on 20 th February 2015.

The Draft Local Plan and associated documents can be viewed on the council's website at www.lbhf.gov.uk/localplan. To comment on these documents please use one of the following methods:

- Online: www.lbhf.gov.uk/localplan
- Email: localplan@lbhf.gov.uk
- Letter: Development Plans Team, Planning Division, Transport and Technical Services Department, Hammersmith Town Hall Extension, King Street, W6 9JU

Copy of public notice placed in the local newspaper

London Borough of Hammersmith and Fulham

**NOTICE OF
PUBLIC CONSULTATION
(Draft Local Plan)**

Planning and Compulsory Purchase Act 2004 and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – Draft Local Plan for the London Borough of Hammersmith and Fulham

Notice is hereby given, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that the London Borough of Hammersmith and Fulham has produced a draft version of the Hammersmith and Fulham Local Plan for consultation.

(a) Title of Document:

The Hammersmith and Fulham Draft Local Plan

(b) Subject Matter:

The Draft Local Plan sets out the vision, objectives and detailed spatial strategy for future development in Hammersmith and Fulham up to 2035 along with specific development management policies. It is accompanied by changes to the adopted Proposals Map and an Environmental Report.

(c) Period within which representations may be made:

Friday 9th January 2015 to 5.00pm Friday 20th February 2015.

(d) How to comment

To make comments on the draft Local Plan and associated documents please use one of the following methods, providing your name and contact details:

- Online: www.lbhf.gov.uk/localplan
- Email: localplan@lbhf.gov.uk
- Letter: Development Plans Team, Planning Division, Transport and Technical Services Department, Hammersmith Town Hall Extension, King Street, W6 9JU

The Draft Local Plan, changes to the adopted Proposals Map and the Environmental Report may be viewed on the council's website: www.lbhf.gov.uk/localplan or at:

- Hammersmith Town Hall Extension, First Floor, Environment Reception (Duty Planner Office) , King Street, London, W6 9JU (9am to 5pm Monday to Friday) .
- and at the borough's reference libraries: **Fulham Library** (SW6 5NX) Opening Hours: Sunday 11am - 5pm, Monday -Thursday 10am - 8pm , Friday - Saturday 10am - 5pm. **Hammersmith Library** (W6 7AT) Opening Hours: Sunday 11am - 5pm, Monday -Thursday 10am - 8pm , Friday - Saturday 10am - 5pm. **Shepherds Bush Library** (W12 7BF) Opening Hours: Sunday 11am - 5pm , Monday - Friday 10am - 8pm , Saturday 10am - 5pm.

The documents may also be requested by phoning 020 8753 3384 or emailing localplan@lbhf.gov.uk

Appendix B – Consultees

List of people consulted on the Draft Local Plan 2015 (Regulation 18)

Statutory Consultees, Duty to Co-operate Orgs, libraries
Environment Agency (London Team)
Canal & River Trust
The Coal Authority
Historic England
Western Riverside Waste Authority
London Borough of Wandsworth
London Borough of Ealing
London Borough of Hounslow
London Borough of Richmond-upon-Thames
The National Grid Company plc
Port & City Health Authority
Royal Borough of Kensington & Chelsea
London Borough of Brent
Highways England
United Kingdom Disabled People Council
Sport England
The Planning Inspectorate
Greater London Authority
Port of London Authority
Thames Water Property Services
Tri-Borough Public Health
Transport for London
Department for Transport
DCLG
Natural England
Homes and Communities Agency
Civil Aviation Authority
Hammersmith and Fulham Clinical Commissioning Group (CCG)
Office of Rail Regulation
Marine Management Organisation
Network Rail Property
Thames Tideway Tunnel
Hammersmith Library
Fulham Library
Shepherds Bush Library

Consultation Statement
Proposed Submission Local Plan

General Consultees
AASHA
Abbeyfield (Chelsea & Fulham) Society
Accessibility Youth Project
Action on Disability
Acton Housing Association
Acton Training Centre
Addison Youth Club
Advance Advocacy & NCH Violence Community Education
Advocacy, Training & Progression (Action on Disability)
African Caribbean Women's Development
African Horn Environmental Protection Link (AHEPL)
Age UK Hammersmith and Fulham
Al Muntada Al Islami Trust
Alumno Developments Ltd
British Rowing
Anthony Goss Planning
Arcus Consulting
Arup Planning Consultants
Asian Elderly Group (Shanti Day Centre)
Asian Womens Welfare Association
Assael Architecture Limited
Association for the Conservation of Energy
Association of Spina Bifida & Hydrocephalus (SE Region)
Association of Town Centre Management
Auriol Kensington Rowing Club
LHR Airports Ltd
Ballymore Properties Ltd.
Banim Street Social Club
Barbers Retirement Association
Barclay Hall Christian Fellowship / Barclay Hall Trust
Barclays Bank Plc
Barker Parry Town Planning
Barn Elms Rowing Club
Barons Court Project
Bechtel Ltd
Bellhouse Joseph
Bellway Homes North London
Beneficial Outreach Centre

Bexley Council
Bharatiya Vidya Bhavan - Institute of Indian Art & Culture
Bibleway
Big Yellow Self Storage Company Ltd
Bishop Creighton House Settlement
Bishops Park Conservation And Improvements Group
Black Families Holiday Alliance
The Boisot Waters Cohen Partnership
BREEAM Department
Brett Group
British Airways PLC
British Geological Survey
British Property Federation
British Red Cross Society- London Branch
British Retail Consortium
BT Group Public Affairs
British Telecom Global Services
St Mungo's Broadway
Sir Oswald Stoll Foundation
Broadway Focus Group
Broadway London
Broadway Shopping Centre
Hammersmith Squash and Fitness Centre
Masbro Brook Green Family Centre
Brunswick Club
Office of Communications
AECOM
Burleigh College
Burlington Danes School
Bush Theatre
Business Enterprise Centre
Business Trust
Byrne Estates
CACI Information Services
CAMOC museums of cities
Campaign for Real Ale
Campaign to Protect Rural England
Canalside Activity Centre
Cara Trust
Bishop Creighton House- Care and Repair

Consultation Statement
Proposed Submission Local Plan

Cargiant Ltd
CaVSA
CBRE
Cedar Lodge Sheltered Housing
Central Gurduara (Khalsa jatha) Sikh Temple
Centre for Armenian Information & Advice (CAIA)
Charing Cross Sports Club
Charlick & Nicholson Architects
Charlotte Sullivan Charity
Chelsea & Fulham Labour Party
Chelsea Football Club
Chelsea Harbour Marina
Chiswick Seventh Day Adventist Church
Christ Church
Christian Charisma fellowship
Church of God Worldwide Mission
CIRIA
CITAS (Community Interpreting Translation Advice Service)
Cityscape Digital
Cluttons LLP
Coca-Cola Great Britain
Colebrooke Legal Advice and Referral Centre
Colliers International
Comer Homes
Commercial & Residential Plc
Communities Empower Network
Community Education Forum
Community Links Project
Confederation of British Industry London Region
Confederation of Indian Organisation
Conrad International Hotel London
Considerate Constructors Scheme
Construction Confederation
Construction Industry Council
Consultant Planning Group
Corporation of London
Council of African & Afro-Caribbean Churches
Countryside Properties
Crime Prevention Design Advice Service
Cruising, Royal Yachting, Amateur

Rowing Association
Cycick (Cycle Community Workshop)
Daisy Trust
Dataview Solutions Ltd
David Lock Associates
deafPLUS
Department for Education
Department for Work and Pensions
Department for Culture, Media & Sports
Department for Business, Innovation and Skills
Department for Environment Food & Rural Affairs
Derek Horne & Associates
Derek Lovejoy Partnership
Development of African Descendence
Diocese of London
Disabled Christian's Fellowship
Disabled Living Foundation
Domestic Violence Intervention Project (DVIP)
dp9
DPDS Consulting
Dr Edwards & Bishop Kings Fulham Charity
Deloitte Real Estate
Ducane Housing Association Ltd
Hammersmith and Fulham Mental Health Unit
Eagle Eyes Association for Afgan Displaced Youth
Ealing Hammersmith & Hounslow Health Org
Ealing, Hounslow and Hammersmith Health Authority
Earls Court and Olympia Group Ltd
Ecole Francaise De Londres
Ecologic Architects
AECOM
Tri-Borough Education Business Partnership
Edward Woods Youth Club
Edwards Woods ASC
Eel Brook Commoners
Emlyn Leisure Gardens Association
Empty Space Theatre Company
Energy Saving Trust
VisitEngland

Consultation Statement
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AMEC
Eric Parry Architects
Ethiopian Christian Fellowship Church
Evergreen Club
Every Nation London
Fairview New Homes Ltd
Fatima Youth & Community Association
Federation of Small Businesses
Friends Families and Travellers-Planning
Business Enterprise Centre-Hammersmith and Fulham
First Plan
Fit Rooms Ltd
Foster and Partners
Foundations UK
Friends of Bishops Park
Friends of Hammersmith Hospital
Friends of Holy Innocents (The)
Friends of Kenmont Primary School
Friends of Margravine Cemetery
Friends of Queensmill School
Friends of Wormwood Scrubs
Fuel Oils (London) Ltd
Fulham Alliance
Fulham Ambulance Station
Fulham Archaeological Rescue Group
Fulham Benevolent Society
Fulham Black Community Association
Fulham Broadway Methodist Church & Ravenscourt Methodist Church
Fulham Broadway Methodist Church
Fulham Conservative Club
Fulham Court Community Group
Fulham Football Club Ltd
Fulham Football in the Community
Fulham Horticultural Society
Fulham Legal Advice Centre
Fulham Palace Meadows Allotment Association
Fulham Palace Trust - Museum of Fulham Palace
Fulham podiatry practice
Fulham Primary Play Centre

Fulham Rotary Club
Fulham Seventh-day Adventist Church
Fulham Society
Fulham Somali Women's Association
Fulham Spiritualist Church
Fulham United Reform Church
Fuller Smith and Turner plc
Furnish / Staying Put Community Store
Gateway Clubs (Mencap)
Gateway Technology Centre
GL Hearn
Goldcrest Homes
Goodman
Government Property Unit
Government Estates-Correspondence Team
Greek Cypriot Association
Greek Orthodox Church of St Nicholas
Greenside Childrens Trust
Grenada & Caribbean Welfare Association
Grenfell Creche
GVA
H & F Pedestrians Association
H & F Pre School Learning Alliance
H&F and Wandsworth Local Group of Ramblers Association
H&F Citizens Advice Bureau
H&F Mind
H&F Rugby Football Club
Banim Street Sheltered Housing
Ealing, Hammersmith and Fulham Sickle Cell and Thalassaemia Support Group
H&F Turkish Association
H&F Victim Support Scheme
H&F Volunteer Centre
Hammersmith & Fulham Chamber of Commerce
Hammersmith & Fulham Jehovah's Witnesses
Hammersmith & Fulham London Cycling Campaign
Hammersmith & Fulham Skills Centre
Hammersmith & Fulham Volunteers Centre

Consultation Statement
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Hammersmith and Fulham Labour Councillors
Hammersmith Eventim Apollo
Hammersmith Christian Fellowship
Hammersmith Conservative Association
Hammersmith Horticultural Society
Hammersmith Hospitals NHS Trust Retirement Fellowship Group
Hammersmith Hospitals Trust
Hammersmith Job Centre
Hammersmith London BID
St Paul's Hammersmith Parish Church
Hammersmith Police
Hammersmith Rotary Club
Hammersmith Salvation Army
Hammersmith Society
Hammersmith United Charities
Hammersmith Womens Aid
Hammersmith Woodcraft Folk
Harper Collins Publishers
Harrow Refugee Forum
Harrow Club
Haven Trust
Health & Safety Executive
Heritage of London Trust
Hi Team
High Speed Two (HS2) Limited
Smiths Gore Planning
Holy Ghost & St Stephen
Holy Innocents
Holy Trinity
Home Builders Federation
Homeline
Horn of Africa
Hotel Ibis
Howard Sharp and Partners
HUDU - Healthy Urban Development Unit
Hurlingham Club
Hurlingham Park Bowls Club
Hyder Consulting Ltd
Institute Civil Engineers (ICE)
Imperial College London
Industry Council for Packaging & The Environment
Inland Waterways Association

Isla Hispana
Muslim Cultural Centre
J Bennett
Jobreach H&F
John Sharkey & Co
Jones Day
Jones Lang LaSalle
Kensington Hotel
Catalyst Housing
Kids Active Ltd
Kidsactive - Michael Williams Palace Playground
Kim Wilkie and Associates
Kingsland Estates Ltd
L Cornwall Partnership
LAMDA
Landmark Information Group Ltd
Latin American Cultural Association of H&F
Lawn Tennis Association
LCH Shepherds House
Liberal Democrats
Lillie Road 5-A-Side League
Lillie Road Football Centre
Living Streets
Local Government Ombudsman
London Ambulance Service NHS Trust
London Borough of Barking and Dagenham
London Borough of Barnet
London Borough of Bromley
London Borough of Camden
London Borough of Croydon
London Borough of Enfield
London Borough of Greenwich
London Borough of Hackney
London Borough of Haringey
London Borough of Harrow
London Borough of Hillingdon
London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham
London Borough of Redbridge
London Borough of Southwark

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London Borough of Sutton
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Bubble Theatre Company
London Buddhist Vihara
Friends of the Earth- London Campaigns Co-ordinator
London Centre for Personal Safety (LCPS)
London Coastguards
London Corinthian Sailing Club
London Corinthian Trust
London Councils
London Cyrenians Housing
London Diocesan Fund
Ecology / Environment Unit
London Fire Brigade
London Historic Parks & Garden Trust
National Housing Federation - London
London Manufacturing Group
London Play
London Playing Fields Society
London Port Health Authority
London Remade
London Rivers Association
London Underground
London United Busways Ltd
London Wildlife Trust
L'Oreal
LRT Pensioners West 6 Area
Lynne Evans Planning
Lyric Theatre
Maria's Health Enhancement
Market Community Centre
Marks & Spencer
Marks & Spencer Plc
Marshes Relief Foundation
Martineau Johnson
Mentoring Project
Metropolitan Police Authority/Service
Metropolitan Police Service
Metropolitan Police Service
Mfantse Mponu Kuw
Michael Barclay Partnership LLP

Ministry of Defence
Mobile Operators Association
Moyal Community Association (UK) London
Murphy Dave Architects
Muscular Dystrophy Campaign
Muslim Women's Association
Napier Court Management Limited
National Deaf Children's Society
National Grid Property Ltd
Nationwide Building Society
NATS-CTC
Natural History Museum
Navratyri Garba
NCP Ltd
New Dawn
New Economics Foundation
New Testament Church of God
NHS London Healthy Urban Development Unit
NHS Property Services Ltd. (NHS PS)
NHS Property Services Ltd. (NHS PS)
NHS Property Services Ltd. (NHS PS)
NOMS - Ministry of Justice
Normand Park Bowling Club
North Fulham NDC
North Thames Gas
Northend Pensioners Club
Notting Hill Housing
Novotel Hotel
Octavia Hill Housing Trust
Octavia Housing
Old Oak Housing Association
Old Oak Youth Club
Open Spaces Society
Osborne Richardson
Our Lady (of Perpetual Help)
Our Lady of Dolours
Outside Edge Theatre Company
Over 60s Group (Holy Trinity)
Overseas Chinese Education Centre
Palace Adventure Playground
Parents & Staff Association (PSA)
Parez & Co

Consultation Statement
Proposed Submission Local Plan

Patel Taylor Architects
Paul Dickenson and Associates
Peabody Trust
Peabody Trust
Peacock Smith
PETAL
Plan Projects
planning potential
Planning Potential
Planware
Pocket Living Limited
Polish Catholic Mission
Polish Educational Society
Polish Cultural Centre
POSK Polish Social & Cultural
Princes Royal Trust
PRP Architects
Public Health
Puffins Nursery School
QPR 1st Supporters Trust
QPR in the Community
Queens Park Rangers
Queens Park Rangers Over 60's Club
Ramblers Association - Hammersmith group
Rapleys
Rapleys
Rapleys LLP
Ravenscourt Park Bowls Club
Real Flame
Reflections Performing Arts
Renewable Power Association
Renewable Energy Association
Researcher
Richard Rodgers Partnership
Richmond Fellowship
Richmond Fellowship
River House Project
River House Trust
Rivercourt Methodist Church
Rivercourt Methodist Church
Rivermead Court Limited
Riverside Artists
Riverside Studios
Romanca Society

Romulus Construction Ltd
Royal Borough of Kensington & Chelsea
Royal Borough of Kingston Upon Thames
Royal British Legion Fulham Women's Section
Royal Mail Legal Services (Property Law)
Royal Mail Property Holdings
Royal Yachting Association
RSPB South East
Rugby House
Sainsburys
Sainsbury's Plc
c/o Turley Associates (Agent)
Sands End Pre-School Playgroup
Savills
Savills
Savills
SBCA Social Section
DB Schenker Rail UK
Scott Brownrigg
Shanti Day Centre
Academy Music Group
Shepherds Bush Empire
Shepherds Bush Families Project
Shepherds Bush Healthy Living Centre
Shepherds Bush Housing Group
Shepherds Bush Islamic Cultural Centre
Shepherds Bush Mosque & Muslim Cultural Centre
Shepherds Bush Road Methodist Church
Shire Consulting
Sickle Cell Society (H&F)
Sir John Lillie Play Centre
Sir John Lillie Primary School
Sir Oswald Stoll Foundation
Sisterhood & Brotherhood
Small Jobs Scheme
Somali Children's Advocacy
Somali Community Support Centre
Ealing Somali Welfare and Cultural Association
Somalian Community Development Organisation
Somer Court Social Club

Consultation Statement
Proposed Submission Local Plan

Sons of the Thames Rowing Club
SPEAR- Resurgo Trust
St Aidan's East Acton RC Church
St Alban's & St Augustine's Church
St Andrew Bobola's Polish Church
St Andrew's Church
St Augustine's Catholic Church
St Christophers (Hostels for Young Single Homeless)
St Clement's & St Etheldreda's Church
St Dionis Church
St George plc
St James Homes Ltd
St John's
St Johns & St James Church
St Johns Ambulance Brigade
St Katherine's Church
St Katherines Playgroup
St Katherines Youth & Community Centre
St Lukes Church
St Martins Property Investments Ltd
St Mary's Friendly Group
St Matthews Church
St Matthew's Church
St Matthew's church
St Michael & St George
St Paul's Church Hammersmith
St Peter's Church
St Peter's Church
St Peter's Primary School
St Saviours with St Mary's
St Simon's Church
St Stephen's & St Thomas'
St Stephen's with St Thomas Social Club
St. George West London LTD
Standard Life Assurance Properties
Standing Together Against Domestic Violence
Star Road Scheme (Vereker/Orchard/Cheesemans)
Substance Misuse Day Care & After Care Programme
Sulgrave Club
Supreme Houses UK Ltd
Tanner T A Centre site

Tasso Baptist Church
Taylor Woodrow Prop Co Ltd
Tesco Stores Plc
Tetlow King Planning
TfL Corporate Finance- Property Development
Thamesbank
The Asian Health Agency
The Beacon
The Bell Cornwell Partnership
The Chelsea Society
The Christian Community Church
The Conservation Volunteers
The Consumers Association- Which?
The Crown Estate Commissioners
The Diocese of London
The Food Standards Agency
The Georgian Group
The Hurlingham Club
The Hurlingham Club
The Lawn Tennis Association
The Mayhew Animal Home
The National Energy Foundation
The Phoenix Canberra Schools Federation
The Planning Bureau
The Prince's Trust
The Ramblers' Association
The Serbian Society
The Urban Partnership
The Victorian Society
The William Morris Academy
Theatres Trust
Thomas Pocklington Trust
Threshold Housing & Support
Threshold Tenant Trust
Townmead Youth Club
tp bennett
Trafalgar House Group Premises Ltd
Transport for London
Traveller Law Reform Projection
Tri-Borough Public Health
Turley Associates
Turning Point (Druglink) H&F
Twynholme Baptist Church

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Union Railways Property
Unite Group Plc
Vencourt Hotel
Virtual Engine
CAVSA
Walt Disney Company Limited
Warner Bros
Ways into Work
Well London Health Champion
West & North West London Vietnamese Association
West & Partners
West End Baptist Church
West London Bangladesh Welfare Association
West London Business
Central and North West London NHS Foundation Trust Community Services
West London Family Church
West London Health Promotion Agency
West London Mental Health NHS Trust
West London Muslim Women & Children
Westcity Holdings Ltd
Westfield
Westminster City Council
Westmoreland Properties Ltd
Westway Childcare Project (formally H&F Travellers)
White City Adventure Playground Support
William Morris Society
Women & Girls Network
Women's Housing Trust
Women's Pioneer Housing
Woodstock Housing Trust
Workspace Group plc
Wormwood Scrubs Pony Centre
Wyndham Grand London
Yarrow Housing
Yonex UK Ltd
Youth Development Summer Camp Project
St William Homes LLP
Dr Anthony Jelley
Mrs Angela Henderson
Miss P Hurst

Mrs Victoria Timberlake
Mr. Frank Colcord
Mrs Adrienne Scott Mirviss
Janet Strachan and Simon Webb
Ms Elizabeth Bridgman
Joanna Brendon
Mrs Josephine Anne Lundberg
Ms Sheila Hancock
Mr Stephen Claypole
Miss Emma Osbaldeston
Nussey
Mr Batterbee
Howard Sinclair
Mr Simon Mallin
Mr John OCallaghan-Williamson
Ms Megha Chopra
Ms Sue Tuck
Mr Martin Peach
Mr Hugo Kirby
Professor Janice Morphet
Michael and Christine Forkin
Mr Richard Osband
Dr Tamara Dragadze
Mrs Owen
mr alistair wagstaff
Peter French
Mrs Sally Taylor
Marianne Cahill and Brett Page
Jane Reed
mrs vanessa wright
Marcia Doyle
Mr Ed Peshall
Ms Meher Oliaji
Mr Andrew Pendleton
Mrs Caroline Wooc
MRS WENDY FEESS
Mr Nick Baker
Mr Don Ward
Mr Alexander Christie
Ms Shirley Cupit
Mrs Jacqueline Christie
Miss Louisa Verney
ms maxine bayliss
Ms Susie Hack
Clare Dickinson
MS Elaine Chumnerly
June Bennett
Ms Irene Arenillas
Mr Andy Slaughter
Roger Weston
Mr Clive Wren
Ms Eugenie White

Consultation Statement
Proposed Submission Local Plan

Mr John Archer
Miss Linda Moll
Miss Sarah Morgan
Mrs Lesley Aspinall
Mr R S Bhatia
Mrs Amanda Stocker
Mr Andrew Jones
Mr David Kellie-Smith
Mrs Florence Quattrocchi
Mr Anthony Williams
Richard Kingham
Mrs Louise Connell
Allan Kelly
Griselda Kellie-Smith
Patricia Hicks
Mr A Fullerton
Nicola D'Aeth
Mr Abel Hadden
J Lane
Ms Nicola Pateman
Haines
Mr Anthony Williams
Mrs Betsy Abdallah
Mrs Prue Errington
Mrs Teresa Manduca
Mrs Sandie Keogh
Ann Rosenberg-Bell
Jill Ware
Kathy and Donald Roll
David and Sarah Morphet
Keith Nethercot
Jeremy Fisher
Susan Doughty
Dianne Imthurn
Patrick Kirwan
Marjorie and Anthony Simonds-Gooding
Jane Reed
Ms Ann Rosenberg
Rita Vlahopoulou

Lisa Irwin
Tom Bogdanowicz
Miss Kimikawa De Castro
Julie Hodgess
Tessa Mason
Brian Richardson
Nigel Hensman
Tony Curzon Price
Julie Jones
David Heathcoat-Amory
Henry Titley and Miss Helen Webb-Carter
Lorna Stevenson
Jim Boothman
Boko Inyundo
David Jeffreys
Cate Latto
Mr Robert Faulkner
Mr and Mrs Kahlor
Melanie Atterbury
Chris Cousins
mr inigo woolf
Mr Tom Graham
Mr Tomas Baranauskas
mr long lam
mr jerry beere
Ms Daniela Ortner
ms mary hicks
Mr David Jeffreys
Mr Abel Hadden
Mr Mark Sylvester
Mrs Audrey Boughton
Ms Hermine Sanson
Mrs Alethea Evans
Mr Ed Hector
Miss Laura Stritch
Mr Piotr Behnke
MR PRASHANT BRAHMBHATT
Mr salahudin moson

Consultation Statement
Proposed Submission Local Plan

Agents
West & Partners
dp9
Nathaniel Lichfield and Partners
Wm Morrison Supermarket Plc c/o- Rapleys LLP
GL Hearn
Turley Associates
LAMBERT SMITH HAMPTON
CMA Planning Ltd
Jones Lang LaSalle
King Sturge
Planning Perspectives
DP9
Indigo Planning
Rolfe Judd Planning
ESA Planning
CB Richard Ellis
Chase and Partners
Shire Consulting
GeraldEve
GVA Grimley
Strategic Perspectives
Peacock & Smith
Barton Willmore
D P 9
D P 9
Cushman & Wakefield LLP
Barton Willmore
Montagu-Evans
GL Hearn
Nathaniel Lichfield and Partners Ltd
D P 9
Maddox & Associates
Entec UK Ltd
Barton Willmore

Jones Lang La Salle
CMA Planning Ltd
CB Richard Ellis
Legal & General Property
Development Planning Partnership
Dron and Wright Property Consultants
GVA Grimley
Boyer Planning
Nathaniel Lichfield & Partners
Jones Lang La Salle
Barton Willmore LLP
Gerald Eve
tp bennett
GVA Grimley
alsop verrill llp
Nathaniel Lichfield & Partners
Jones Lang LaSalle
Barton Willmore
DP9
ICENI Projects
Knight Frank
King Sturge Llp
Stamford Brook Residents Association
Knight Developments Ltd
Jones Lang LaSalle
Macfarlane Road Residents Association
Colliers International
CgMs Consulting
London First
GL Hearn Ltd
Chase and Partners
LAMBERT SMITH HAMPTON
Indigo Planning
Carter Jonas LLP

Consultation Statement
Proposed Submission Local Plan

Resident and Tenants Associations
Abdale Road Residents' Association
Ada Lewis Tenants' And Residents Association
Addison Bridge Place Residents Association
Addison Forum
Albion House Residents Association
Albion Mews Tenants Association
Alley Tenants & Residents Association
Argyll and Glyn Co-operative Limited
Arlington House Residents Association
Ashchurch Residents Association
Ashcroft Square Tenants Association
Askew Crescent/Clifton Ave Residents Association
Askew Crescent/Clifton Avenue Residents' Association
Askham Court Tenants Club
Aspen Gardens Tenants and Residents Association
Association Of Residents In Sands End (ARISE)
Avalon Road Residents Association
Avonmore Gardens Residents Association
Avonmore Mansions Residents Association
Avonmore Residents Association
Banim Street Tenants Association
Barb Mews Association
Barclay Close Residents And Tenants Association
Barclay Road Residents Association
Baron's Court Estate Neighbourhood Association
Baron's Court Residents Association
Barons Keep Limited
Barons Keep Management Committee
Barons Keep Residents' Association
Barons Keep Tenants Association
Barton Court Residents Association
Barton House Tenants' And Residents' Association
Becklow Gardens Residents' Association
Bishop Creighton House Community Centre
Bishops Mansions Limited
Bishops Park Conservation And Improvements Group
Bishops Park Co-ordinating Group
Blythe Neighbourhood Forum
Brackenbury Residents' Association
Brading Terrace Residents Association
Bramley Housing Co-op
Brickfields Area Residents Association
Brightwells & Lowlands Tenants Association
Britannia Road Residents Association
British Grove Group

Broadway Supported Housing Trust
Brompton Park Residents Association
Brook Green Association
Browning Court Tenants Association
Broxholme House Tenants and Residents Association
Burne Jones Tenants Association
Cambridge Grove & Leamore Street Residents Association
CARMRA Clem Attlee Residents' Association
Carnwath House Tenants' And Residents' Association
Caroline Estate Tenants' Association
Caroline Tenants & Residents Association
Cathnor Park Area Action Group
Charcroft Court Tenants' And Residents' Association
Charecroft Estate Tenants and Residents Association
Chelsea Harbour Residents' Association
Chiswick Protection Group
Clem Attlee Residents Association
Clem Attlee Rocque & Maton Residents Association
Clem Attlee Tenants' Association
Cleverly Estates Tenants Association
Clifton Avenue Residents Association
Colebrooke Social Cultural & Welfare Association (CSCWA)
College Park Residents Association
Conservation Society
Crabtree Estate Residents Association
Crisp Road Residents Association
Da Palma Court Tenants' Association
Devonport Road Residents Association
Digby Mansions (20-29) Residents' Association
Digby Mansions (39-58A) Residents' Association
Dorcas Estate Tenants & Residents Assocn
Dorset Wharf Community Hall
Drive Mansions Residents Association
East Chiswick Residents' Association
East Sector Working Group
Edward Woods Tenants & Residents Association
Edward Woods Tenants and Residents Association
Elmgrove House Residents' Association
Emlyn Gardens Tenants Association
Emlyn Road Residents Association
Empress Place Action Group
Eynham Residents Association
Faroe Road Residents Association
Field Road Tenants' Association
Flora Gardens Tenants Association

Consultation Statement
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Flora Gardens Tenants Association
Friends of Bishops Park
Friends of Chelsea Studios
Friends of Furnivall Gardens
Friends of Hammersmith Hospital
Friends of Kenmont Primary School
Friends of Margravine Cemetery
Friends of Queens Mill School
Friends of Fulham Palace
Friends of Brompton Cemetery
Friends of Wormwood Scrubs
Fulham Court Community Group
Fulham Court Tenants and Residents Association
Furnivall Gardens Tenants Association
Gayford Road Association
Gibbs Green Tenants & Residents Association
Gibbs Green Tenants and Residents Association
Glyn Leaseholders Association
Godolphin Road Community Garden Association
Gordon Court & Du Cane Residents Association
Goldhawk Road Residents Association
Grampian Residents Association
Granville Mansions Association
Greenside Residents Action Group
Greenside Road Residents Association
Grove Neighbourhood Centre
Grove Tenants Association
Guinness Trust Tenants & Residents Association
Hadyn Tenants Association
Haldane Residents Association
Halford Residents Association
Hamlet Court Residents Association
Hammersmith & Fulham Friends of the Earth
Hammersmith & Fulham Historic Buildings Group
Hammersmith Community Gardens Association
Hammersmith Grove Group
Hammersmith Embankment Residents Association
Hammersmith Grove Society
Hammersmith Mall Residents Association
Hanover Court Residents Association
Harbledown Residents Association
Hetley Road Residents' Association
Hetley Road Residents' Association
Harwood Mews Residents Association
Herbert Court Tenants Association
Hever Estate Tenants Association
Hilary Close Residents Association
Hurlingham District Residents Association

Hurlingham Mansions Residents Association
Imperial Square & Harwood Terrace Tenants & Residents
Island Triangle Residents Association
Imperial Wharf (East) Residents Association
Independent Residents at Townmead Estate
Jepson House Tenants & Residents Association
John Knight Lodge Residents Group
Keir Hardie Tenants Association
Kensal Rise Association of Boaters
Kelmscott Gardens Tenants and Residents Association
Kensington Hall Gardens Residents Assoc
King Edward Mansions Residents & Tenants
King Henry's Reach Residents Association
King Henry's Reach Residents Association
King Street Traders Association
King's Court (London) Association
King's Court Residents Association/Private Tenants Assoc
Kingsley House Residents Association
Kingswood/Munster/Wyfold Residents & T.A
Lakeside Road Area Association
Lampeter Square Tenants Association
Lakeside Road Area Tenants Association
Lancaster Court Tenants and Residents Association
Lancaster Court Tenants and Residents Association
Latymer Court Freehold Company Limited
Latymer Court Tenants' Association
LETRA Tenants Association
Lewis Trust Tenants Association
Lillie Road Residents Association
Lime Grove Residents Association
Linacre Court Tenants and Residents Association
Loftus Road Residents' Amenities Protection Association
Lisgar Estate, Southern Housing Group
Lord Napier Place Residents Association
Lord Roberts Mews Management Limited
Lord Napier Place Residents Association
Lygon House Residents Social Club
Lytton Estate Tenants' And Residents' Association
Lytton House Residents Association
Margravine and Field Road Tenants and Residents Association
Margravine Gardens And St Dunstan's Road Residents' Assoc.
Marryat Court Residents' Association
Malvern Court Tenants' Association
Macfarlane Road Residents' Association
Masbro Residents Association

Consultation Statement
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Maystar Community Association
Maystar Community Tenants and Residents Association
Musgrave Crescent Residents' Association/Neighbourhood Watch
Minford Gardens Tenants Association
Napier Court Residents Association
Napier Court Management Ltd
Neighbourhood Watch
New Hurlingham Court Ltd
New Deals For Communities Team
New King's Road West Residents' Association
New Shepherds Bush Market Traders Association
North End House Residents Association
North Sherbrooke Residents Association
Old Oak Community Association
Old Oak Tenants and Residents Association
Old Oak Community Centre
Osram Court Tenants Association
Palliser Court Residents Association
Park Mansions Tenants Association
Parkview Court Residents Association
Palace Mansions Leaseholders Association
Parsons Green Residents Association
Peabody Estate Tenants' Association (Hammersmith)
Peabody Estate Tenants' Association (Cleverly)
Pearcroft Court Tenants Association
Pennard Neighbourhood watch
Peterborough Road & Area Residents' Association
PETAL Peabody Estate Tenants Association (Lillie Road)
Philpot Square Tenants and Residents Association
Plane Tree Tenants Association
Phoenix Lodge Residents Limited
Pulton Place Tenants Association
Queen Caroline Tenant & Residents Association
Queens Club Residents' Association
Queen Caroline Tenants and Residents Association
Queens Mansions Leaseholders Assocr.
RAPA - Residents Amenity Protection Association
Residents' Association Of Coverdale Road
The Ravenscourt Society
Residents of Moore Park Area Association
River Gardens Amenity Ltd
River Thames Society
Riverside Gardens Sheltered Housing Scheme
Riverside Gardens Tenants and Residents Association

Robert Owen House Tenants Association
Robert Owen House Tenants Association
Romney Court Residents & Tenants Association
Rosebank Residents Association
Rugby Mansions Ltd
Rylston Road Residents Association
Sands End Area Projects In Action
Samuel Lewis Trust Residents' Action Group
Shepherds Bush Local History Society
Shepherds Bush Market Tenants Association
Shepherds Bush Place Residents Association
Shepherds Bush Residents Assocn.
Sinclair Road Residents' Association
Sir Oswald Stoll Mansions Residents' Association
Springvale Tenants and Residents Association
St Peters Residents Association
St Peters Residents Association
St Peter's Resident's Association
St. Pauls Studios Residents Association
St Helen's Residents Association
St. Paul's Court Estate (Management Committee)
Stamford Brook Residents Association
Stamford Court Residents Association
Stanlake Road Tenants And Residents Association
Stebbing House Tenants Association
Stocken Tenants Action Group
Sulgrave Gardens Residents' Association
Stable Way Residents Association
Sulgrave Leaseholders Association
Sullivan Court Tenants' And Residents' Association
Sullivan Court Resident's Association
Sullivan Court Tenants and Residents Association
TAPE (Tenants Association Peabody Estate)
Tea Rose Wharf Residents Association
The Avenue Leaseholder's Association
Thamesbank
The Island Triangle Residents' Association
The London Heliport Limited
The Maltings Residents Association Limited
The Piperian Residents Association
Townmead Estate Tenants Association
Townmead Tenants & Residents Association
Triangle Residents
Twynholm Residents Association
United Women's Homes Association
Vanston Place Tenants Association
Vereker Road Tenants and Residents Association

Consultation Statement
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Verulam House Residents' Association
W14 Housing Co-op
Waldemar Avenue Mansions Tenants Association
Walham Green Residents & Tenants Association
Walham Grove Residents' Association
Wardo Avenue Residents Assoc.
Waterhouse Close Sheltered Housing
Westcroft Square Residents' Association
Welbeck Court Residents Association
Wendell Park Community Group
West 12 Housing Co-op
West Kensington and Gibbs Green Residents Associations
West Kensington Court Residents Assoc
West Kensington Residents Association
West Kensington Tenants Association

West London Architectural Society
West London Federation Of Tenants
West London River Group
West London Studios Management Ltd
White City Residents Association
White City Community Association
Whiteholt Community Association
William Church Tenants & Residents Association
William Church Tenants and Residents Association
Willow Vale Residents Association
Wood Lane Residents Association
Wood Lane Tenant and Residents Association
Woodlands Area Residents Association
Woodmans Mews Tenant and Residents Association
Wormholt Tenants and Residents Association

Consultation Statement
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CIL Consultees
Alliance Planning
Alsop Verrill Ltd
Anthony Bowhill & Associates
Applied Environmental Research Ltd
Ardent Holding
Asda c/o Thomas Eggar
Association of Eritrean Jeberti in UK
Atisreal
B Elliot Ltd
B H Community UK
BAA Airports Ltd
Barclay Road Social Club
Barton Willmore
BBC
BE ME
Bennett Urban Planning
Bennett Urban Planning
Berkeley Group c/o Quod
Berkeley Homes c/o Quod
Bexley Council
Bishops Park & Winnington Bowls Club
Body & soul Charity
Boist Waters Cohen Partnership
BRE
British Telecom Global Services
British Trust for Conservation Volunteers
British Waterways
Broadway Centre Project
Broadway Club
Broadway Malyan Landscape Ltd
Broadway Squash and Fitness Centre
BT
Bullen Consultants
BURA
Buro Happold
Bush Theatre (Alternative Theatre Company)
Care and Repair
Castle Centre
Cedar Lodge Sheltered Housing
CFBT Careers Service
CgMs
Charing Cross & West London Hospitals
Chelsea Football Club c/o CBRE
Chelsea Harbour co/ Jones Lang LaSalle
Chris Blandford Associates
CMA Planning
Community Mental Health Trust
Connections Communications Centre
Conservation Society
Costco Wholesale UK Ltd (Costco)
Crossrail Ltd
Cunnane Town Planning
Dataview Solutions Ltd
DCMS
DEFRA

Design Council Cabe
Diligence Advice
Domestic Violence Intervention Project (DVIP)
DP9
DPP
DPSD Consulting, Group
Drive Mansions Residents Association
Drivers Jonas Deloitte
E H & F Mental Health NHS Trust
Ebony Sistren Housing Association
EDAW Ltd
EDF Energy
Education Business Partnership
Education Funding Agency (former Partnership for Schools)
Educational Development School
Employment Initiatives
English Partnerships
Enjoy England
Entec
Eric Parry Architects
FFT Planning
First Base Enterprise Centre
First Plus Planning
FPD Savills
Friends and Neighbours
FSU North Fulham
Fulham FC
Fulham Good Neighbour Service
G M Dennis & Partners
Green Issues Communications
Greenwich Leisure Limited
Groundwork West London
Halcrow Fox
Hammersmith Academy
Hammersmith Apollo
Harrison Housing
Haven Project
Health and Safety Executive
Heathrow Hub
His People Christian Church
Hives Partnership Planning
Hogarth Architects
Home-Start
HS2 Ltd
HSBC
ICE
Iceni Projects Ltd
Icon Architects
Imperial College
Imperial College c/o Jones Lang LaSalle
Indigo Planning
Indigo Planning
Information Technologists Company (Hammersmith Academy)
Jones Lang LaSalle

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Land Securities c/o Chase and Partners
Landuse Consultants
Llewelyn Davies
London 21 Sustainable Network
London Play
London Strategic Health Authority
London West Learning & Skills Council
Lovell Partnerships
Maddox Associates
Marks and Spencers c/o Nathaniel Lichfield & Partners
Masstrade
Mayor's Office for Policing and Crime (MOPAC) / Metropolitan Police Service (MPS) c/o CgMs
Milap Weekly
Monahan Blythen Architects
Mozambique Community - UK
National Grid Property Holdings c/o Drivers Jonas Deloitte
National Grid Property Ltd
National Playing Fields Association
New Covent Garden Soup Co. Ltd
NHS HUDU
Norland Conservation Society
Northend Road Traders Association
Nubian Life
Objective Corporation
P & O Earls Court/Olympia
Park Court Sheltered Scheme
Park Royal Partnership
Polygram UK
Port & City Health Authority
Port of London Authority
Projects in Partnership
Ptarmigan Riverside c/o DP9
Queens Club Gardens Ltd
Rail Link Engineering
Ransome and Company
Refugee Council
Refugee Women & Children's Welfare Association (RWCWA)
Royal Borough of Kensington and Chelsea
Royal London Asset Management
Royal United Kingdom Beneficent Association (RUKBA)
RPS
Ryder Architecture
Sainsbury's c/o Turley Associates
Save The Children Fund (Travellers Unit)
Savills
Savills
Schenker Rail UK
Scribes UK
Shepherds Bush Advice Centre (SBAC)
Shepherds Bush Bar Charter
Shepherds Bush Consultative Group

Shepherds Bush Housing Association
Shurgard Storage Centres UK Ltd
Sitematch London, 3Fox International Limited
Solum Regeneration
Somali Women Support & Development Group
SOMCENTRE (Somali Refugee Learning & Support Centre)
Sport England
St Christophers Fellowship
St Mungo Community Housing Association
Stanhope c/o Gerald Eve
Steamboat Developments Ltd
Stenning Consultancy
Sustainable Development Programmes
Terra Firma Consultancy
Tesco c/o GL Hearn
Tha Serbian Society
Thames Explorer Trust Education Group
Thames Wharf Studios Ltd
The Church Commissioners
The Local Futures Group
The London Planning Practice LPP
Threshold Advice Centre
Threshold Housing Advice
Transport for London
Travelodge c/o Turley Associates
Trinity Free Church
Tuke Manton Architects LLP
UK Power Networks
Unite Group Plc
United Friendly Assurance
United Kingdom Disabled People Council
Universal Island Records
Urban and Infrastructure Projects Group
Voluntary Sector Resource Agency H&F
Waste Watch
Well London Health Champion
Wendell Park Playgroup
West London Centre for Counselling
West London Community Services Foundation
West London Free School
West London River Group
Western Kurdistan Association
Western Riverside Waste Authority
Western Riverside Waste Authority
Westway Development Trust
Whitbread
White City Neighbourhood Forum
Wild London
Wimpey Homes Holding Ltd
Women and Girls Network
Women's Pioneer Housing
Wood Sanders & Co Ltd
Woodlands Area Residents
Wormholt Tenants & Residents Association
WRAP

Consultation Statement
Proposed Submission Local Plan

Wyndham
Youth Link Intervention Project

Zed-Interaid UK

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Waste Consultees
Environment Agency (London Team)
London Borough of Wandsworth
Royal Borough of Kensington & Chelsea
London Borough of Lambeth
Western Riverside Waste Authority
Greater London Authority
Buckinghamshire County Council
Dorset County Council
Essex County Council
London Borough of Havering
Hertfordshire County Council
London Borough of Hillingdon
Milton Keynes Council
Slough Borough Council
Surrey County Council
Thurrock Council
Wiltshire Council
West Sussex County Council
Royal Borough of Greenwich
North Yorkshire County Council
Kent County Council
Peterborough City Council
Oxfordshire County Council
Northamptonshire County Council
Bury Council

London Borough of Bexley
London Borough of Ealing
London Borough of Hounslow
London Borough of Richmond-upon-Thames
London Borough of Brent
London Borough of Barking and Dagenham
London Borough of Newham
London Borough of Redbridge
London Borough of Havering
North London Waste Plan
London Borough of Sutton
London Borough of Croydon
Royal Borough of Kingston Upon Thames
London Borough of Sutton
London Borough of Merton
London Borough of Hillingdon
London Borough of Bromley
London Borough of Lewisham
London Borough of Southwark
London Borough of Tower Hamlets
Westminster City Council
Suffolk Council
South East Waste Planning Advisory Group
Doncaster
City of London Corporation

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Retail Consultees
Fawcett House 2A Starfield Road London W12 9SW
63 Askew Road London W12 9AH
65 Askew Road London W12 9AH
66 Askew Road London W12 9BJ
67 Askew Road London W12 9AH
68 Askew Road London W12 9BJ
69 Askew Road London W12 9AH
70 Askew Road London W12 9BJ
71 Askew Road London W12 9AH
72 Askew Road London W12 9BJ
73 Askew Road London W12 9AH
74 Askew Road London W12 9BJ
75 Askew Road London W12 9AH
76 Askew Road London W12 9BJ
77 Askew Road London W12 9AH
78 Askew Road London W12 9BJ
79 Askew Road London W12 9AH
80 Askew Road London W12 9BJ
81 Askew Road London W12 9AH
82 Askew Road London W12 9BJ
83 Askew Road London W12 9AH
85 Askew Road London W12 9AH
86 Askew Road London W12 9BJ
Post Office 87 - 91 Askew Road London W12 9AS
88 Askew Road London W12 9BJ
89 Askew Road London W12 9AS
90 Askew Road London W12 9BJ
92 Askew Road London W12 9BL
93 Askew Road London W12 9AS
94 Askew Road London W12 9BL
95 Askew Road London W12 9AS
96 Askew Road London W12 9BL
97 Askew Road London W12 9AS
100 Askew Road London W12 9BL
101 Askew Road London W12 9AS
103 Askew Road London W12 9AS
104 Askew Road London W12 9BL
105 Askew Road London W12 9AS
106 Askew Road London W12 9BL
107 Askew Road London W12 9AS
108 Askew Road London W12 9BL
109 Askew Road London W12 9AS
110 Askew Road London W12 9BL
111 Askew Road London W12 9AS
112 Askew Road London W12 9BL
113 Askew Road London W12 9AS
114 Askew Road London W12 9BL
115 Askew Road London W12 9AS
116 - 118 Askew Road London W12 9BL
Ravens House 117 Askew Road London

120 Askew Road London W12 9BL
Ground Floor 121 Askew Road London W12 9AU
The Sun Quarter 122 Askew Road London
Ground Floor 123 Askew Road London W12 9AU
124 Askew Road London W12 9BL
125 Askew Road London W12 9AU
126 Askew Road London W12 9BL
Ground Floor 127 Askew Road London W12 9AU
128 Askew Road London W12 9BL
129 Askew Road London W12 9AU
131 Askew Road London W12 9AU
133 - 135 Askew Road London W12 9AU
135 Askew Road London W12 9AU
137 - 139 Askew Road London W12 9AU
141 Askew Road London W12 9AU
143 Askew Road London W12 9AU
145 Askew Road London W12 9AU
147 Askew Road London W12 9AU
149 Askew Road London W12 9AU
151 Askew Road London W12 9AU
153 Askew Road London W12 9AU
155 Askew Road London W12 9AU
157 Askew Road London W12 9AU
159 Askew Road London W12 9AU
161 Askew Road London W12 9AU
163 Askew Road London W12 9AU
167 - 181 Askew Road London W12 9AX
79 Bloemfontein Road London W12 7DA
73 Bloemfontein Road London W12 7DA
75 Bloemfontein Road London W12 7DA
81 Bloemfontein Road London W12 7DA
65 Bloemfontein Road London W12 7DA
67 Bloemfontein Road London W12 7DA
71 Bloemfontein Road London W12 7DA
89 Bloemfontein Road London W12 7DA
85 Bloemfontein Road London W12 7DA
87 Bloemfontein Road London W12 7DA
69 Bloemfontein Road London W12 7DA
93 Bloemfontein Road London W12 7DA
83 Bloemfontein Road London W12 7DA
77 Bloemfontein Road London W12 7DA
91 Bloemfontein Road London W12 7DA
Charnock House Australia Road White City Estate London W12 7QX
Ground - First Floors Nightingale House 1 - 7 Fulham High Street London SW6 3JH
6 Fulham High Street London SW6 3LQ
8 Fulham High Street London SW6 3LQ
Habib House 9 - 13 Fulham High Street London SW6 3JH
10 - 12 Fulham High Street London SW6 3LQ

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14 Fulham High Street London SW6 3LQ
15 Fulham High Street London SW6 3JH
16 Fulham High Street London SW6 3LQ
17A Fulham High Street London SW6 3JH
18 - 20 Fulham High Street London SW6 3LQ
19 Fulham High Street London SW6 3JH
21 - 23 Fulham High Street London SW6 3JH
22 Fulham High Street London SW6 3LQ
Ground Floor Bishops Park House 25 - 29 Fulham High Street London SW6 3JH
26 Fulham High Street London SW6 3LQ
27 Fulham High Street London SW6 3JH
28 Fulham High Street London SW6 3LQ
29 Fulham High Street London SW6 3JH
30 - 32 Fulham High Street London SW6 3LQ
31 - 35 Fulham High Street London SW6 3JH
34 Fulham High Street London SW6 3LQ
40 - 42 Fulham High Street London SW6 3LQ
41 Fulham High Street London SW6 3JJ
43 Fulham High Street London SW6 3JJ
44 Fulham High Street London SW6 3LQ
45 Fulham High Street London SW6 3JJ
46 Fulham High Street London SW6 3LQ
47 Fulham High Street London SW6 3JJ
48 Fulham High Street London SW6 3LQ
52 Fulham High Street London SW6 3LQ
53 - 55 Fulham High Street London SW6 3JJ
54 Fulham High Street London SW6 3LQ
56 Fulham High Street London SW6 3LQ
57 Fulham High Street London SW6 3JJ
58 Fulham High Street London SW6 3LQ
Eden House 59 Fulham High Street London SW6 3JJ
60 - 62 Fulham High Street London SW6 3LQ
61 Fulham High Street London SW6 3JJ
63 - 65 Fulham High Street London SW6 3JJ
64 Fulham High Street London SW6 3LQ
65 Fulham High Street London SW6 3JJ
66 Fulham High Street London SW6 3LQ
67 Fulham High Street London SW6 3JJ
764 - 766 Fulham Road London SW6 5SJ
766A Fulham Road London SW6 5SJ
768 Fulham Road London SW6 5SJ
770 Fulham Road London SW6 5SJ
772 - 774 Fulham Road London SW6 5SJ
776 Fulham Road London SW6 5SJ
Ground Floor Rear Of 778 Fulham Road London SW6 5SJ
Post Office 780 Fulham Road London SW6 5SL
782 Fulham Road London SW6 5SL
784 Fulham Road London SW6 5SL
786 Fulham Road London SW6 5SL
788 Fulham Road London SW6 5SL

790 Fulham Road London SW6 5SL
792 Fulham Road London SW6 5SL
947 Fulham Road London SW6 5HY
949 Fulham Road London SW6 5HY
951 - 953 Fulham Road London SW6 5HY
Ground Floor And Basement Front 955 - 957 Fulham Road London SW6 5JJ
957 Fulham Road London SW6 5HY
959 - 961 Fulham Road London SW6 5HY
961 Fulham Road London SW6 5HY
963 Fulham Road London SW6 5JJ
965 Fulham Road London SW6 5JJ
967 Fulham Road London SW6 5JJ
969 Fulham Road London SW6 5JJ
The Coach House 1 Playfair Street London W6 9SA
54 Fulham Palace Road London W6 9PH
56 Fulham Palace Road London W6 9PH
58 Fulham Palace Road London W6 9PH
Ground Floor 60 - 62 Fulham Palace Road London W6 9PH
Distillers Arms 64 Fulham Palace Road London W6 9PH
68 Fulham Palace Road London W6 9PL
70 Fulham Palace Road London W6 9PL
72 Fulham Palace Road London W6 9PL
74 Fulham Palace Road London W6 9PL
Ground Floor 76 Fulham Palace Road London W6 9PL
78 Fulham Palace Road London W6 9PL
Old Suffolk Punch 80 Fulham Palace Road London W6 9PL
Basement And Ground Floors 82 Fulham Palace Road London W6 9PL
84 Fulham Palace Road London W6 9PL
86 Fulham Palace Road London W6 9PL
Ground Floor Front 91 Fulham Palace Road London W6 8JA
92 Fulham Palace Road London W6 9PL
93 Fulham Palace Road London W6 8JA
94 Fulham Palace Road London W6 9PL
Ground Floor 96 Fulham Palace Road London W6 9PL
97 Fulham Palace Road London W6 8JA
98 Fulham Palace Road London W6 9PL
99 Fulham Palace Road London W6 8JA
100 Fulham Palace Road London W6 9PL
101 Fulham Palace Road London W6 8JA
102 Fulham Palace Road London W6 9PL
103 Fulham Palace Road London W6 8JA
104 Fulham Palace Road London W6 9PL
105 Fulham Palace Road London W6 8JA
106 Fulham Palace Road London W6 9PL
107A Fulham Palace Road London W6 8JA
108 Fulham Palace Road London W6 9PL

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109 - 111 Fulham Palace Road London W6 8JA
110 Fulham Palace Road London W6 9PL
111 Fulham Palace Road London W6 8JA
112 - 114 Fulham Palace Road London W6 9PL
113 Fulham Palace Road London W6 8JA
115 Fulham Palace Road London W6 8JA
117 Fulham Palace Road London W6 8JA
119 Fulham Palace Road London W6 8JA
121 Fulham Palace Road London W6 8JA
123 Fulham Palace Road London W6 8JA
125 Fulham Palace Road London W6 8JA
Ground Floor 127 Fulham Palace Road London W6 8JA
56 Goldhawk Road London W12 8HA
57A Goldhawk Road London W12 8EG
58 Goldhawk Road London W12 8HA
59 Goldhawk Road London W12 8EG
Ground Floor 60 Goldhawk Road London W12 8HA
61 Goldhawk Road London W12 8EG
62 Goldhawk Road London W12 8HA
63 - 65 Goldhawk Road London W12 8EG
64 Goldhawk Road London W12 8HA
67 Goldhawk Road London W12 8EG
68 Goldhawk Road London W12 8HA
69 Goldhawk Road London W12 8EG
70 Goldhawk Road London W12 8HA
71 Goldhawk Road London W12 8EG
72 Goldhawk Road London W12 8HA
73 Goldhawk Road London W12 8EG
74 Goldhawk Road London W12 8HA
76 Goldhawk Road London W12 8HA
Raving Buddha 77 Goldhawk Road London W12 8EG
Ground Floor 78 Goldhawk Road London W12 8HA
79 - 81 Goldhawk Road London W12 8EG
80 - 82 Goldhawk Road London W12 8HA
81 Goldhawk Road London W12 8EG
83 Goldhawk Road London W12 8EG
Shepherd And Flock 84 Goldhawk Road London W12 8HA
85 Goldhawk Road London W12 8EG
86 Goldhawk Road London W12 8HD
Post Office 88 Goldhawk Road London W12 8HD
90 Goldhawk Road London W12 8HD
92 Goldhawk Road London W12 8HD
94 Goldhawk Road London W12 8HD
96 Goldhawk Road London W12 8HD
98 Goldhawk Road London W12 8HD
100 Goldhawk Road London W12 8HD
102 Goldhawk Road London W12 8HD
104 Goldhawk Road London W12 8HD

106 Goldhawk Road London W12 8HD
Ground Floor 108 Goldhawk Road London W12 8HD
112 Goldhawk Road London W12 8HD
114 Goldhawk Road London W12 8HD
116 Goldhawk Road London W12 8HD
118 Goldhawk Road London W12 8HD
120 Goldhawk Road London W12 8HD
Advertising Rights On Flank Wall 256 Goldhawk Road London
Unit 1 168 - 188 Fulham Palace Road London W6 9PA
169 - 171 Fulham Palace Road London W6 8QT
171 Fulham Palace Road London W6 8QT
173 Fulham Palace Road London W6 8QT
175 Fulham Palace Road London W6 8QT
177 Fulham Palace Road London W6 8QT
179 - 183 Fulham Palace Road London W6 8QZ
185 Fulham Palace Road London W6 8QX
187 Fulham Palace Road London W6 8QX
189 Fulham Palace Road London W6 8QX
190 Fulham Palace Road London W6 9PA
191 Fulham Palace Road London W6 8QX
192 Fulham Palace Road London W6 9PA
193 Fulham Palace Road London W6 8QX
194 Fulham Palace Road London W6 9PA
195 Fulham Palace Road London W6 8QX
196 Fulham Palace Road London W6 9PA
197 Fulham Palace Road London W6 8QX
198 - 200 Fulham Palace Road London W6 9PA
199 Fulham Palace Road London W6 8QX
201 - 207 Fulham Palace Road London W6 8QX
202 Fulham Palace Road London W6 9PA
204 Fulham Palace Road London W6 9PA
206 Fulham Palace Road London W6 9PA
208 Fulham Palace Road London W6 9NT
209 Fulham Palace Road London W6 8QX
211 Fulham Palace Road London W6 8QX
212 Fulham Palace Road London W6 9NT
214 Fulham Palace Road London W6 9NT
216 Fulham Palace Road London W6 9NT
218 Fulham Palace Road London W6 9NT
220 Fulham Palace Road London W6 9NT
392 Lillie Road London SW6 7PE
394 Lillie Road London SW6 7PE
398 Lillie Road London SW6 7PE
400 Lillie Road London SW6 7PE
402 Lillie Road London SW6 7PE
1 Baron's Court Road London W14 9DP
1 Charleville Road London W14 9JL

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2 Castletown Road London W14 9HE
2 Charleville Road London W14 9JL
4 North End Crescent London W14 8TQ
6 North End Crescent London W14 8TQ
6 Charleville Road London W14 9JL
8 North End Crescent London W14 8TQ
10 - 12 North End Crescent London W14 8TQ
12B North End Crescent London W14 8TQ
62 North End Road London W14 9EP
64 North End Road London W14 9EP
66 North End Road London W14 9EP
68 North End Road London W14 9EP
70 North End Road London W14 9EP
78 North End Road London W14 9ES
80 North End Road London W14 9ES
82 North End Road London W14 9ES
Springside House 84 North End Road London
86 North End Road London W14 9EX
88 North End Road London W14 9EX
90 North End Road London W14 9EX
92 North End Road London W14 9EX
94 North End Road London W14 9EX
96 North End Road London W14 9EX
98 North End Road London W14 9EX
100 North End Road London W14 9EX
102 North End Road London W14 9EX
104 North End Road London W14 9EX
106 North End Road London W14 9PP
108 North End Road London W14 9PP
110 North End Road London W14 9PP
112 - 114 North End Road London W14 9PP
137 North End Road London W14 8XU
139 North End Road London W14 9NH
141 North End Road London W14 9NH
142 - 148 West Cromwell Road London W14 9AE
143 - 145 North End Road London W14 9NH
147 North End Road London W14 9NH
149 North End Road London W14 9NH
150 West Cromwell Road London W14 9AE
151 North End Road London W14 9NH
153 North End Road London W14 9NH
155 North End Road London W14 9NH
157 North End Road London W14 9NH
159 - 161 North End Road London W14 9NH
163 - 165 North End Road London W14 9NH
167 North End Road London W14 9NH
169 North End Road London W14 9NH
175 North End Road London W14 9NL
177 North End Road London W14 9NL
183 North End Road London W14 9NL
185 North End Road London W14 9NL
187 North End Road London W14 9NL

189 North End Road London W14 9NL
193 North End Road London W14 9NL
195 North End Road London W14 9NL
197 - 199 North End Road London W14 9NL
199 North End Road London W14 9NL
201 North End Road London W14 9NL
203 North End Road London W14 9NL
White Horse 1 - 3 Parsons Green London SW6 4UL
Cote Brasserie 47 Parsons Green Lane London SW6 4HH
50 Parsons Green Lane London SW6 4HU
Amuse Bouche 51 Parsons Green Lane London SW6 4JA
The Square 61 Parsons Green Lane London
67 - 69 Parsons Green Lane London SW6 4JA
70 Parsons Green Lane London SW6 4HU
71 Parsons Green Lane London SW6 4JA
73 Parsons Green Lane London SW6 4JA
75 Parsons Green Lane London SW6 4JA
77 Parsons Green Lane London SW6 4JA
Post Office 1 Hazlebury Road London SW6 2NA
Basement And Ground Floor 99 Wandsworth Bridge Road London SW6 2TE
101 Wandsworth Bridge Road London SW6 2TE
103 Wandsworth Bridge Road London SW6 2TE
105 - 107 Wandsworth Bridge Road London SW6 2TE
107A Wandsworth Bridge Road London
109 Wandsworth Bridge Road London SW6 2TE
Basement And Ground Floors 111 Wandsworth Bridge Road London SW6 2TE
112 Wandsworth Bridge Road London SW6 2TF
113 Wandsworth Bridge Road London SW6 2TE
114 Wandsworth Bridge Road London SW6 2TF
115 Wandsworth Bridge Road London SW6 2TE
116 Wandsworth Bridge Road London SW6 2TF
Public Telephone Box To Front Of Mirabel House 117 - 121 Wandsworth Bridge Road London
118 Wandsworth Bridge Road London SW6 2TF
120 Wandsworth Bridge Road London SW6 2TF
122 Wandsworth Bridge Road London SW6 2TF
123 - 125 Wandsworth Bridge Road London SW6 2TS

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124 Wandsworth Bridge Road London SW6 2UL
126 Wandsworth Bridge Road London SW6 2UL
127 Wandsworth Bridge Road London SW6 2TT
128 Wandsworth Bridge Road London SW6 2UL
129 Wandsworth Bridge Road London SW6 2TT
130 Wandsworth Bridge Road London SW6 2UL
131 Wandsworth Bridge Road London SW6 2TT
132 Wandsworth Bridge Road London SW6 2UL
133 Wandsworth Bridge Road London SW6 2TT
134 Wandsworth Bridge Road London SW6 2UL
136 Wandsworth Bridge Road London SW6 2UL
138 Wandsworth Bridge Road London SW6 2UL
140 Wandsworth Bridge Road London SW6 2UL
142 Wandsworth Bridge Road London SW6 2UL
171 Uxbridge Road London W12 9RA
173 Uxbridge Road London W12 9RA
175 Uxbridge Road London W12 9RA

177 Uxbridge Road London W12 9RA
179 Uxbridge Road London W12 9RA
Basement Of 183 And Ground Floor 181 - 183 Uxbridge Road London W12 9RA
185 Uxbridge Road London W12 9RA
187 Uxbridge Road London W12 9RA
189 Uxbridge Road London W12 9RA
191 Coningham Road London
193 Uxbridge Road London W12 9RA
195 Uxbridge Road London W12 9RA
197 Uxbridge Road London W12 9RA
412 Uxbridge Road London W12 0NR
414 Uxbridge Road London W12 0NR
416 Uxbridge Road London W12 0NR
418 Uxbridge Road London W12 0NR
420 Uxbridge Road London W12 0NR
424 Uxbridge Road London W12 0NR
426 Uxbridge Road London W12 0NR
428 Uxbridge Road London W12 0NR
432 Uxbridge Road London W12 0NR
British Queen 434 Uxbridge Road London W12 0NS
436 - 438 Uxbridge Road London W12 0NS
440 Uxbridge Road London W12 0NS
442 Uxbridge Road London W12 0NS
444 Uxbridge Road London W12 0NS
446 Uxbridge Road London W12 0NS
448 Uxbridge Road London W12 0NS

List of people and organisations who responded to the Draft Local Plan 2015 (Regulation 18)

Resident / Organisation	
Tri-Borough Public Health	Transport for London Commercial Development
Miss Linda Moll	Susanna Gretz
Marine Management Organisation	Wildstone Planning
Liberal Democrats	Mr Stephen Duckworth
Ms Sheila Hancock	mr nicolas crosthwaite
Mr Anthony Williams	Port of London Authority
Peterborough Road and Area Residents Association	Jane Abrahart
National Grid	Sarah Abrahart
Buckinghamshire County Council	David Thomson
Remi Serwa	Jackie Hunter
Tony Curzon Price	West Kensington and Gibbs Green Community Homes, West Kensington estate TRA and Gibbs Green and Dieppe Close TRA
Mrs Gillian Miller	Julian Hillman
Magdalena Kwiatkowska	Sue Gluck
Lesley Sunderland	Chelsea Football Club
The Theatres Trust	Natural England
Sue Smith	Greater London Authority
Rachel Hendry	Pocket Living Limited
John Conaghan	Nicola Easten
Sara Cook	Matthew Burton
The Happiness Centre	Fordstam Ltd
Virginia Arendt	Westfield Shoppingtowns Ltd
Mr Miguel Ragageles	Planware
Ms Emma Skinmore	Catalyst Housing Ltd
Robert Still	Anabela Hardwick
Grace Hall	Heathrow Airport Ltd
Emma Henderson	Thames Water Utilities Ltd
Janet Coe	HS2 Ltd
Friends of Wormwood Scrubs	London Fire and Emergency Planning Authority
Octavia Housing	WM Morrisons Supermarkets PLC
Mr Martin Peach	Groundwork London
Martin Gem	Campaign for Real Ale
Sarah Johnson	Home Builders Federation
Highways Agency	Hammersmith and Fulham Clinical Commissioning Group (CCG)
Sir Stephen Waley-Cohen	The Berkeley Group
Mobile Operators Association	Marks & Spencer Plc
Mr Greg Hands MP	Environment Agency
Camilla Green	Royal Borough of Kensington & Chelsea
South East Waste Planning Advisory Group	MP Kings Retail Sarl
Universities Superannuation Scheme Limited	Martin West
Imperial College London	Emma Juhasz
Surrey County Council	Hammersmith London BID

Consultation Statement
Draft Local Plan

National Grid Property Ltd
St Augustine's Catholic Church
Canal & River Trust
Ptarmigan Riverside AW LLP
St Quintin and Woodlands Neighbourhood Forum
Cargiant and London and Regional
NHS Property Services Ltd. (NHS PS)
Aurora Property Group Ltd
Woodlands Area Residents
Wells House Road Residents Association
Westminster City Council
Capital and Counties on Behalf of Earls Court and Olympia Group
The Regents Network

Charecroft Estate Tenants and Residents Association
Hammersmith Mall Residents Association
Hammersmith Society
H&F Disability Forum
Hammersmith & Fulham Historic Buildings Group
Land Securities
West London Link Design
Kentucky Fried Chicken (Great Britain) Limited
West London Line Group
English Heritage-London Region
Ms Pauline Fowler
Jonathan Williams